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PROPOSED
LIVESTOCK GRAZING & WILDERNESS
MANAGEMENT

for the

Eastern San Diego Co. Planning Unit

Final Environmental Impact Statement

United States Department of the Interior
Bureau of Land Management
California

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1980b

Department of the Interior

Final Environmental Impact Statement
Proposed Grazing and
Wilderness Management
for the
Eastern San Diego County Area
(McCain Valley)
California

Prepared by

Bureau of Land Management

Department of the Interior

Roberta A. Reed

State Director, California State Office

Bureau of Land Management
Library
Bldg. 50, Denver Federal Center
Denver, CO 80225

COVER SHEET

( ) Draft (X) Final Environmental Statement

U.S. Department of the Interior, Bureau of Land Management, California Desert District, California

1) Type of Action: (X) Administrative () Legislative

2) Abstract: The EIS area is located 60 miles east of San Diego, California, and encompasses 98,902 acres of public land. The Bureau of Land Management proposes to implement a grazing management program on 67,903 acres and to recommend 41,776 acres suitable for wilderness designation. The overall objectives of the proposal are to improve range vegetative conditions, which will provide a continuing supply of forage for livestock and wildlife, and to preserve wilderness characteristics and the naturalness of the area from man's imprint, which will preserve solitude and the primitive recreation experience. The proposed action for grazing management will initially reduce present licensed use (4925 AUMs) to 2914 AUMs (41% below present licensed use). By the year 2001 forage production would increase by 3143 AUMs to 6057 AUMs through the implementation of deferred rotation treatments on 64,486 acres and land treatments on 7261 acres (400 acres mechanical and 6861 acres burning). This would result in a restoration of all reductions and an additional 1292 AUMs available for livestock and wildlife, with future allocations to be made in proportion to present allocations.

The proposed action recommends wilderness designation, for Congressional action, on the Sawtooth Mountains WSA (27,205 acres) and the Carrizo Gorge WSA (14,571 acres). Areas recommended as unsuitable include 958 acres in the Table Mountain WSA; 3,892 acres in the Sawtooth Mountains WSA; 2131 acres in the San Ysidro WSA; and 5265 acres in the San Felipe WSA. These are preliminary recommendations and do not represent a final decision by the Secretary of the Interior, and are subject to change during further administrative review.

The designation of a WSA as a wilderness area would establish protection of wilderness resources as that area's dominant objective. This would generally result in reduced soil erosion, increased game and hunting success, and a greater opportunity for solitude and primitive recreation. Sensitive plants and wildlife, cultural resources, and Native American values would receive added protection. Grazing operations and mineral entry and mining in existence at the time of designation would continue. Vegetative manipulations, introduction of exotic plants and animals, and developed recreation activities would generally be precluded. Pre- and post fire suppression techniques would be approved on a case-by-case basis. An area not designated as wilderness would allow a broader utilization of resources. Intensive uses prohibited in a wilderness area would be allowed. However, wilderness qualities may be impaired to a degree that future designation would be precluded.

3) Alternatives Considered:

a) Grazing

i) No Grazing
ii) Intensive Use (Livestock Maximization)
iii) Proposed Action
iv) Limited Use (Enhancement of the Resource Values)
v) No Action

b) Wilderness

i) Maximize Wilderness
ii) No Wilderness
iii) Proposed Action
iv) Limited Wilderness

4) Comments have been requested from the following: (See Attachment)

5) Further information may be obtained from:

Mr. Gerald E. Hillier
California Desert District
1695 Spruce Street
Riverside, CA 92507
(714) 787-1428

Comments on the Final Environmental Statement will be requested from the following agencies and interest groups:

FEDERAL AGENCIES

Environmental Protection Agency

Advisory Council on Historic Preservation

U.S. Department of the Interior
- Bureau of Mines
- Heritage Conservation and Recreation Service
- Water and Power Resources Service
- Geological Survey
- Fish and Wildlife Service
- Bureau of Indian Affairs
- Natural Resource Library

U.S. Department of Agriculture
- Environmental Quality Affairs
- Forest Service
- Soil Conservation Service
- Animal Health Services

U.S. Senators (California)

U.S. House (California)

Department of Commerce

Department of Justice

Customs

Department of Treasury

Border Patrol

CALIFORNIA - STATE AGENCIES

Office of the Governor

Office of Planning and Research

State Historic Preservation Office

Resources Agency

- Department of Water Resources
- Air Resources Board
- Division of Mines and Geology
- Division of Oil and Gas

Resources Agency (con't)

Native American Heritage Commission Service
Department of Fish and Game
Department of Parks and Recreation
Department of Forestry

CALIFORNIA - LOCAL AGENCIES

San Diego County Board of Supervisors

San Diego County Office of Fire Services

Integrated Planning Office

San Diego County Parks and Recreation

San Diego County Air Pollution Control

San Diego County Environmental Division

San Diego Agricultural Commissioners Officer

San Diego County Farm Advisor

Comprehensive Planning Organization (CPO)

OTHER ORGANIZATIONS

Natural Resources Defense Council

Sierra Club

California Native Plant Society

Audubon Society

Desert Bighorn Council

Wilderness Society

California Wildlife Federation

California Hawking Club

San Diego Cattlemen's Association

American Motorcycle Association

Boy Scouts of America

San Diego County Archaeological Society

OTHER ORGANIZATIONS (cont.)

Pacific Crest Trail Blazers

California Natural Areas Coordinating Council

Desert Protective Council

Citizens ORV Committee

Southwestern Prospectors and Miners

Nature Conservancy

California Association of 4 Wheel Drive Clubs

Riverside District Grazing Advisory Board

California Federation of Mineralogical Societies

San Diego County Council of Mineral Societies

San Diego Mineral and Gem Society

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Part I

Consultation/Coordination

CONSULTATION AND COORDINATION

The preparation of the Eastern San Diego County Grazing and Wilderness Environmental Impact Statement (EIS) was announced in a Notice of Intent to write the EIS published in the Federal Register of October 13, 1978. A team of resource specialists from the BLM California State Office, BLM California Desert District Office, and El Centro Resource Area of the Riverside District prepared the document. The team contacted other Federal offices, State and local agencies, interested groups, and individuals. Communications varied from formal written correspondence to informal personal contact and telephone calls. The Bureau of Land Management's preparation of this document was and will continue to be covered in local, regional, and statewide media.

Consultation and coordination with the public received special consideration throughout the planning process and was an intregal part of the development of the proposed action and alternatives. The public participation process has ocurred in three phases: identification of publics and issues (Phase I); specific resource input (Phase II); and identification and analysis of management recommendations in MFP Step 2 (Phase III). A fourth phase, MFP Step 3 management decisions, will follow the completion of the final EIS. These steps are described in detail below.

Phase I of the planning process consisted of notifying by mail approximately 400 individuals, groups, agencies, and media of intentions to develop the land-use plan and requesting comment and input. In addition, a preselected group of 25 persons representing a wide range of resource interests was called together in March 1979 at Pine Valley, California, and nominal group technique was used to identify issues that should be addressed in the plan. This meeting identified all resources of consequence to the study area and in particular wilderness and livestock grazing values. After this meeting a letter was sent to each participant summarizing the results and what steps would follow.

In addition to the public contact and consultation associated with the Eastern San Diego County Plan, a statewide inventory of roadless areas for identifying Wilderness Study Areas was conducted which provided public input relevant to wilderness resources in the study area. Public hearings concerning the wilderness inventory were held in March 1979 in El Cajon, Hemet, and Los Angeles, California. Later in August 1979, public meetings were held concerning the Draft Report on the Intensive Wilderness Inventory in El Cajon, Hemet, and Los Angeles. These meetings afforded a substantial amount of public involvement concerning wilderness values of the study area as well as other areas of the region.

During Phase II, BLM resource specialists contacted peers, interest groups, and other agency representatives to solidify views on resource management opportunities, issues, and management recommendations to be incorporated into MFP Step 1. Some contacts were by telephone, while others involved informal meetings, some of which were held locally and some in San Diego. Contacts included local four-wheel-drive clubs, motorcycle

clubs, equestrian groups, hikers, campers, hunters, rockhounds, the Museum of Natural History, California Department of Fish and Game, private consultants, California Department of Transportation, small prospectors, Sierra Club, Wilderness Society, Audubon Society, Desert Protective Council, and grazing lessees.

Phase III of the planning process began with four public meetings to present the Eastern San Diego County MFP Step 1 recommendations and draft MFP Step 2. The meetings were held November 1, 1979, at El Cajon; November 2, 1979, at El Centro; November 3, 1979, at Pine Valley; and January 27, 1980, at Canebrake, California. Information obtained at these meetings was used as input in developing MFP Step 2 land-use recommendations of the plan. These recommendations ultimately formed the basis of the proposed grazing and wilderness management alternatives, as well as other alternatives analyzed in the draft environmental impact statement. The public review and comment of this draft report and the subsequent final environmental report will end Phase III. Phase IV will involve public announcement, review, and comment on management decisions reached and ultimately implementation of the plan. Agencies and interest groups which will receive copies of the environmental impact statement and decision documents are listed in the cover sheet of this report.

The DEIS was filed with the Environmental Protection Agency (EPA). The EPA Federal Register notice, published on August 8, 1980, announced a 45-day review period ending September 22, 1980. After the DEIS was filed with the EPA, copies of the document were mailed to Federal, State, and local government agencies and to non-government organizations and individuals for review and comment on the adequacy of the impact analysis for five grazing and four wilderness management alternatives. Also, copies of the DEIS were sent to all livestock operators along with a letter requesting them to set a time, during the review process, to consult with the Area Range Conservationist and Area Manager on the ramifications of implementing any one of the proposed alternatives. Approximately 450 copies of the DEIS were sent to all groups and individuals.

During the review process, 23 letters were received from Federal, State, and local agencies and private organizations such as special interest groups. Personal consultation with individual livestock operators and local governments did occur. All letters received are printed in this final environmental impact statement (FEIS). All letters were reviewed and considered in the preparation of this FEIS. Responses have been made to all pertinent comments that questioned impact analysis or data, presented new information, or raised questions directly bearing upon the implementation of five alternatives.

Response to Letters

Each letter received during the comment period is provided and a corresponding response, where appropriate, follows each letter. Each letter has been numbered consecutively in order of receipt and are presented in that order. Comments are numbered consecutively within each letter beginning with "1." The response to each comment follows with corresponding number of the letter and comment.

COMPREHENSIVE
PLANNING ORGANIZATION

Suite 524, Security Pacific Plaza
1200 Third Avenue
San Diego, California 92101
(714) 236-5300

July 30, 1980

JUL 31 1980

Mr. Gerald Hillier
El Centro Resource Area Manager
Bureau of Land Management
833 South Waterman Avenue
El Centro, CA 92243

Subject: DEIS Eastern San Diego County Planning Unit

Dear Mr. Hillier:

The above referenced DEIS has been received by the Comprehensive Planning Organization. Under the CPO's Areawide Clearinghouse procedures, your project will be considered by the Executive Committtee at its August 29 meeting to determine whether detailed review by the CPO Board of Directors is required. The meeting will be held in the CPO conference room at 8:00 A.M. Your attendance at the meeting is welcomed. Following the Executive Committee meeting, a statement of its action will be immediately forwarded to you.

Areawide Clearinghouse review will be carried out in accordance with the objectives and criteria summarized on the back of this letter. The steps in the Areawide Clearinghouse review process are also summarized.

A major purpose of this preliminary review is to provide assistance in developing a complete and successful project. Ruth Potter of the CPO staff will be contacting you regarding this project. If you have any questions about the review process or if we can be of assistance in any way, please do not hesitate to contact Ms. Potter at 236-5300.

Sincerely,

Joan K. Martin

JOAN K. MARTIN
Director, Areawide Clearinghouse

JKM/DD/oc

NI-81-47

SAN DIEGO REGION'S COUNCIL OF GOVERNMENTS

MEMBER AGENCIES: Cities of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, San Diego, San Marcos and Vista/Ex-officio Member: California Department of Transportation/Honorary Member: Tijuana, B. CFA.

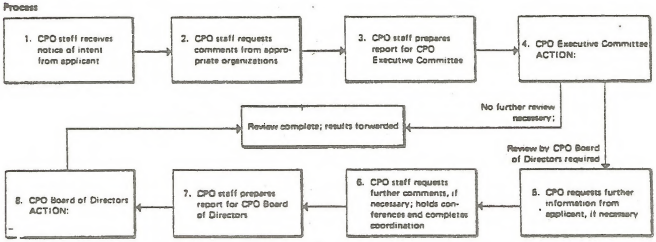
AREAWIDE CLEARINGHOUSE REVIEW

Objectives

The Areawide Clearinghouse Review process in San Diego is a regionwide intergovernmental cooperation mechanism designed to improve federal and state activities in a manner consistent with local government needs. It provides a quick and efficient service to federal, state and local governments by maximizing direct intergovernmental contacts before major federal and state planning, funding, development and regulatory decisions are completed.

The process works best at the outset of federal and state planning and decision-making affecting the San Diego Region. Often its most useful product is the strengthening of local applications for federal funds prior to the point when they are submitted to the federal government, thereby improving the chances for funding approval. The process also has the capability of revealing untimely, inconsistent, or duplicating federal and state activities and is designed in a positive, cooperative framework that supports the needs of local governments.

Process



Criteria

1. The extent to which the project is consistent with or contributes to the fulfillment of comprehensive planning for the region, or any of its localities.
2. The extent to which the proposed project:
   (a) Duplicates, runs counter to, or needs to be coordinated with other projects or activities being carried out in or affecting the area; or
   (b) Might be revised to increase its effectiveness or efficiency.
3. The extent to which the project contributes to the achievement of State, areawide, and local objectives and priorities relating to natural and human resources and economic and community development including:
   (a) Appropriate land uses for housing, commercial, industrial, governmental, institutional, agricultural, and other purposes.
   (b) Wise development and conservation of natural resources, including land, air, water, mineral, wildlife, vegetative and others;
   (c) Balanced transportation systems, including highway, air, water, pedestrian, mass transit, and other modes for the movement of people and goods;
   (d) Adequate outdoor recreation and open space;
   (e) Protection of areas of unique natural beauty, historical and scientific interest;
   (f) Properly planned community facilities, including utilities for the supply of power, water, and communications, for the safe disposal of wastes, and for other purposes; and
   (g) Concern for high standards of design.
4. The extent to which the project significantly affects the environment including the consideration of:
   (a) the environmental impact of the proposed project;
   (b) Any adverse environmental effects which cannot be avoided should the proposed project be implemented;
   (c) Mitigation measures proposed to minimize the impact;
   (d) Alternatives to the proposed project;
   (e) The relationship between local short term uses of man's environment and the maintenance and enhancement of long term productivity;
   (f) Any irreversible and irretrievable commitments of resources which would be involved in the proposed project or action, should it be implemented; and
   (g) The growth, inducing impact of the project.
5. The extent to which the project contributes to more balanced patterns of settlement and delivery of services to all sectors of the area population; including minority groups.
6. Effects on energy resource supply and demand.
7. The extent to which people or businesses will be displaced and the availability of relocation resources.
8. In the case of a project located in the coastal zone, the relationship of the project to the approved State program for the management of the coastal zone and its consistency therewith.
9. In the case of a project for which assistance is being sought by a special purpose unit of government, whether the unit of general local government having jurisdiction over the area in which the project is to be located has applied, or plans to apply for assistance for the same or a similar type project.

Paul G. Chace & Associates

Antiquities & Cultural Environment Specialists

Archaeology · Historic Sites · Museums

1823 Kenora Drive
Escondido, Ca. 92027
Tel: (714) 743-8609

30 July 1980

El Centro Resource Area Manager
Bureau of Land Management
833 South Waterman Avenue
El Centro, California 92243

Re: Draft Environmental Impact Statement
Proposed Livestock Grazing & Wilderness
Management for the Eastern San Diego
County Planning Unit

Dear Sir:

We appreciate the opportunity to review this important document.

2.1 The treatment of cultural resources appears to be sound and well considered. The value of these resources, both those presently documented and those yet to be discovered within the area, is immense. Planning alternatives which maximize their preservation in place and reduce inadvertent disturbance are much to be preferred. Premature salvage of the resources to mitigate destructive impacts may be essential in some instances but is likely to be both more expensive and less desirable archaeologically than a well planned avoidance of those impacts.

Sincerely,

Don Laylander

Don Laylander

Response to Paul G. Chace & Associates

Response 2.1

The Bureau's cultural resource program, like all such programs in the Federal system, strictly complies with all Federal legislation dealing with mitigation of impacts on cultural resources. As clearly stated in the National Historic Preservation Act, the Archaeological and Historical Preservation Act and Federal Land Policy and Management Act of 1976, preservation of cultural resource material must be undertaken in any Bureau-initiated project.

The Bureau, although realizing that salvage archaeology is a viable alternative in preserving cultural resources, sees preservation in situ of cultural sites as the mitigation of choice.

Because of these policies the El Centro Area office will in most cases elect to preserve in situ those cultural sites which are endangered by impending projects. Only when implementation of this procedure is infeasible will other mitigation be recommended.

United States Department of the Interior

WATER AND POWER RESOURCES SERVICE
LOWER COLORADO REGIONAL OFFICE
P.O. BOX 427
BOULDER CITY, NEVADA 89005

IN REPLY REFER TO: LC-159
120.1

AUG 0 8 1980

Memorandum

To: El Centro Resource Area Manager, Bureau of Land Management, 833 South Waterman Avenue, El Centro, California 92243

From: Regional Environmental Officer

Subject: Draft Environmental Impact Statement, Proposed Livestock Grazing and Wilderness Management for the Eastern San Diego County Planning Unit

We have reviewed the subject statement with respect to Water and Power Resources Service's (WPRS) interest in the Planning Unit area. No conflicts or impacts to present or planned WPRS projects were identified.

Thank you for the opportunity to review the DEIS.

Acting for
K. M. Trompeter

August 6, 1980

El Centro Resource Manager
Bureau of Land Management
833 South Waterman Avenue
El Centro, California

Dear Sir:

Since I depend on the area involved in the Eastern San Diego County Planning Unit for winter cultural, recreational and other uses, I submit the following comments on your draft environmental impact statement on the management of BLM Lands.

Since the No Action Grazing alternative follows current management practices, it is obvious why so much of the area is in poor or fair condition. Current BLM management allows for 130% of the livestock use of the Intensive Use alternative.

4.1 There is obviously a need to turn this situation around and restore this overused and abused area. When the "limited Use" Grazing alternative is 80% of the "Intensive Use" alternative, it is obvious that little consideration is being given to early recovery of this degraded area. Since the "No Grazing" alternative is probably not feasible from political, social and other standpoints, there is much too large a jump to the next two alternatives proposing 80% at Alternative 4 and 87% at Alternative 3 of the Intensive Use grazing level.

4.2 What is needed is an additional grazing alternative which really involves limited grazing use, say at the 40% of Intensive Use level. This could be combined with more positive wildlife habitat restoration and development measures to make up an "Environmental Quality" alternative.

A "Proposed Action" which leaves 10,852 acres in "fair" condition after 20 years of "improvement" does not indicate to me proper stewardship of my public lands. I recommend that an "Environmental Quality" alternative as outlined above be added to the choices available and become the "Proposed Action" on grazing management.

E. Kitchener Walker

E. Kitchener Walker
9933 S. Carriage Lane
Canby, Oregon 97013

Response to E. Kitchener Walker

Response 4.1

The alternatives are based on alternatives presented in the MFP. These were developed from MFP Step 1 recommendations and the MFP Step 2 conflict resolution process and, therefore, adequately meet all resource needs. Alternative 4 meets all wildlife requirements; further grazing reductions would provide no additional benefits. It should also be noted that reductions of 39% from present stocking rates would be made under Alternative 4, compared to only 23% reduction under the intensive use-alternative.

Other factors in addition to AUM allocations must be taken into account when analyzing the alternative spreads. For example, 60,646 acres would be grazed under Alternative 4; 67,903 acres under Alternative 3; and 80,169 acres under Alternative 2. This represents spreads of 12% between Alternatives 3 and 4, and 30% between 2 and 4. Other differences include varying amounts of riparian habitat, protected acres of bighorn range closed to grazing, and the number of new allotments.

Response 4.2

Before resource recommendations and subsequent development of the use alternatives were made, a public scoping meeting was held to identify resource needs, issues, and concerns. From the list of identified issues and concerns, five alternative grazing management proposals were designed. In terms of identified concerns for environmental quality and wildlife habitat improvement, the proposed action was felt to meet the needs. For example, Peninsular bighorn sheep is the only wildlife species either federally or State-listed as threatened, endangered, or rare. Dietary studies showed no heavy competition for the same forage. However, water is considered to be the limiting factor. As a result of this conflict, the proposed action would eliminate grazing from that major portion of the bighorn range (In-Ko-Pah Mountains - 8,300 acres) which would provide for the maintenance of a viable herd.

From the best information and data available on present deer populations and predicted future populations under the proposed action, the proposed management would provide forage for deer. In fact, the intensive-use alternative would provide the greatest benefit for increasing deer habitat because of the scope of the land treatments proposed.

Of the 12 miles of riparian habitat within the EIS area, 3 miles were identified for protection. The proposed action would provide for the fencing of these areas with the remainder (in good to excellent condition) systems.

Finally, it is felt that the food requirements for other small mammals, especially rodents, are met by: (1) setting limits on the utilization of perennials; (2) by not including annual forage species in the proposed allocation; and (3) by setting a minimum production level (200 lbs./acre) of annual forage species before this would be allocated under emphemeral leasing. This emphemeral permit would be determined each year, with the 200 lbs./acre as the limiting factor.

Response 4.2 (cont.)

Referring to the range condition discussion in the "Affected Environment" section of the draft EIS, range condition is defined as the condition of and availability of palatable forage, not the ecological condition.

This area is 25-30% chaparral. One objective of the proposed action is to improve range condition (forage condition). The only way to do this would be through implementing a land-treatment program. These chaparral areas are presently in poor forage condition but could be considered in good to excellent ecological condition. This type of condition is not beneficial to livestock or wildlife. The land treatments would improve habitat for wildlife and forage conditions for livestock while, at the same time, impeding the progression of the chaparral to a good or excellent ecological condition. Since the chaparral zone is in such poor range condition (forage condition), it is believed that, with the implementation of a land-treatment program, poor range conditions would be reduced, increasing the amount of fair condition range. A jump of any considerable amount into the good range condition class is unlikely in 20 years, although the amount of good condition range would increase after 20 years.

Comparison of the intensive-use alternative (#2) and the proposed action alternative (#3) indicates that range condition would show a greater improvement under Alternative 2 than under Alternative 3 because of land treatments. As a result, the proposed action would provide a better opportunity for the area to reach or sustain a good to excellent ecological condition. This is the main reason that so much poor condition rangeland (forage condition) exists after 20 years.

Some of the poor range conditions that would exist after 20 years could also be attributed to site potential--some areas do not favor establishment of palatable forage species because of limiting factors such as rainfall and soil fertility.

In summary, the proposed action would not only leave 10,852 acres in fair condition; Table III-6 shows 19,034 acres in fair condition; 10,125 acres in good condition; and 816 acres in excellent condition. The 10,852 acres identified in your letter is a reduction in the amount of poor condition range.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

Project #D-BLM-K65040-CA

5 SEP 1980

Mr. Dave Mari, Area Manager
Bureau of Land Management
833 South Waterman Ave.
El Centro CA 92243

Dear Mr. Mari:

The Environmental Protection Agency (EPA) has received and reviewed the Draft Environmental Impact Statement (DEIS) titled PROPOSED LIVESTOCK GRAZING AND WILDERNESS MANAGEMENT FOR THE EASTERN SAN DIEGO COUNTY PLANNING UNIT.

The EPA's comments on the DEIS have been classified as Category LO-1. Definitions of the categories are provided by the enclosure. The classification and the date of the EPA's comments will be published in the Federal Register in accordance with our responsibility to inform the public of our views on proposed Federal Actions under Section 309 of the Clean Air Act. Our procedure is to categorize our comments on both the environmental consequences of the proposed action and the adequacy of the environmental statement.

The EPA appreciates the opportunity to comment on this DEIS and requests three copies of the Final Environmental Impact Statement when available.

If you have any questions regarding our comments, please contact Susan Sakaki, EIS Coordinator, at (415)556-7858.

Sincerely yours,

Jake Mackenzie, Director
Surveillance and Analysis Division

Enclosure

EIS CATEGORY CODES

Environmental Impact of the Action

LO—Lack of Objections

EPA has no objection to the proposed action as described in the draft impact statement; or suggests only minor changes in the proposed action.

ER—Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

EU—Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

Adequacy of the Impact Statement

Category 1—Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

Category 2—Insufficient Information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

Category 3—Inadequate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft impact statement is assigned a Category 3, no rating will be made of the project or action, since a basis does not generally exist on which to make such a determination.

California Wilderness Coalition

POST OFFICE BOX 429 • DAVIS, CALIFORNIA 95616 • (916) 758-0380

September 11, 1980

El Centro Resource Area Manager
Bureau of Land Management
833 South Waterman Ave.
El Centro, CA 92243

Dear RA Manager:

We wish to offer the following brief comments on the Draft EIS for Proposed Grazing and Wilderness Management for the Eastern San Diego County Area.

WILDERNESS: We support the proposal to recommend 40,086 acres as suitable for wilderness designation but urge that Wilderness Alternative I--maximum wilderness recommendation--be adopted in the final EIS. Due to the high biological and wildlife values of the five Wilderness Study Areas (WSAs) involved, wilderness designation is necessary as a management restraint to prevent unwarrented resource degradation such as that caused by off-road vehicle use. Claimed inability to properly manage an area as wilderness, such as the claim that San Ysidro Mountain WSA and San Felipe Hills WSA are "distant from BLM offices and would be difficult to manage as wilderness" is clearly based on inadequate importance being attached to wilderness resource preservation in terms of budget and manpower allocations. High priority should be given to preservation of these remaining wildlands and management difficulities should be eliminated by the closure of intruding roads and acquisition of private inholdings where necessary. 6.1

GRAZING: The proposed action to limit livestock grazing to a level closer to the carrying capacity of the range is a step in the right direction. However, the habitat requirements of the rare Peninsular bighorn sheep have not been adequately provided for in the proposed alternative. The remnant bighorn population owes its decline in part to competition with domestic livestock, which will continue under the proposed action. At the minimum, grazing by domestic stock should be totally eliminated in 1) all areas currently utilized as Peninsular bighorn sheep habitat, including portions of the In-Ko-Pah, Mt. Tule and Tierra Blanca grazing allotments, 2) all areas with potential for reintroduction of this species to its former range, including portions of the Oriflame, Canebrake and Vallecito grazing allotments and 3) all riparian areas. Trespass cattle should be removed frequently. The protection of natural resources and wildlife, particularly the enhancement of rare or endangered species, should be given priority over consumptive and commercial resource uses such as livestock grazing on the public lands. 6.2 6.3 6.4

Thank you for considering our comments.

Sincerely

Dennis Coules
Project Coordinator

Response to California Wilderness Coalition

Response 6.1

Text has been revised; reference to distance has been dropped. See Part II of this document "Modifications and Corrections," revisions of page 2-55.

Response 6.2

Fecal analysis studies conducted by the El Centro Resource Area Office from 1978 through 1979 identified no major forage conflicts between cattle and bighorn sheep. It is true that many plants grazed by sheep are grazed by livestock. However, there is virtually no competition for the major plant species heavily grazed by sheep since the six species of plants which make up 63% of the bighorn diet comprise only 13% of the cattle diet. More emphasis is now being directed towards water needs and the stress placed on sheep by the presence of cattle. Implementation of Alternative 3 would exclude livestock grazing from 35 of the 40 square miles of existing sheep habitat (Map II-7). This would include all the critical watering sources identified in the URA/MFP process. The remaining 5 square miles of habitat to be grazed by livestock is a transition zone between the desert scrub community and the mixed chaparral. It is not denied that sheep use this area. However, it is the professional judgment of the Resource Area Manager, based on field data and public comments during the planning process, that there would be no serious conflict in this zone. The increase in plant cover and lack of escape terrain would limit the stay of sheep to short periods of time. Implementation of Alternative 3 would provide for a stable herd of 100 bighorn sheep.

If Alternative 4 were implemented, which would eliminate cattle from all of the 40 square miles of sheep habitat, the herd would include 110 sheep. There would be no significant change if Alternative 4 were selected over Alternative 3.

It is Bureau policy to manage and conserve crucial wildlife habitat, as well as to manage livestock grazing as a legitimate use of public lands and to provide for its stabilization. At the same time, the policy dictates that the Bureau protect the resources from destruction or unnecessary injury. Implementation of Alternative 3 is believed to be the most reasonable until specific geographic studies (i.e., In-Ko-Pah Mountains) show that bighorn sheep in this area are under stress due to the presence of livestock (see mitigation measure 19 in the "Modifications" section). Although we feel Alternative 3 meets resource needs, comments such as these will be considered in the process leading to a selected course of action.

Response 6.3

The last and first paragraphs of pages 3-25 and 3-26 respectively, contradict your statement that "habitat requirements of bighorn sheep have not adequately been provided for in the areas proposed for reintroduction" (Canebrake and Vallecito). The proposed plan for reintroducing bighorn sheep is not expected to be significantly affected by livestock grazing; by the year 2001 there would be a re-established bighorn herd occupying these portions of their historic range. Two reasons for this are stated in the EIS: first, livestock grazing would be eliminated from the critical habitat in the Canebrake Allotment; second, the reintroduction would occur on steep slopes unsuitable for livestock grazing--sheep would graze primarily on these slopes.

Response 6.3 (cont.)

The proposed allotment boundaries under Alternative 3 were established for ease of management. However, all the land within the boundaries has not been allocated to livestock. This allocation was based on certain range suitability criteria (i.e., slope, distance to water, production). As a result, approximately 50% of the Canebrake and Vallecito Allotments and more than 50% of the Oriflamme Allotment were not allocated to livestock because of steep, rocky slopes. For this reason, too, we believe the re-establishment of bighorn sheep will be successful by the year 2001.

Response 6.4

All identified riparian areas in poor and declining condition would be protected by eliminating grazing through fencing. The remaining riparian zones are in good to excellent condition and would be grazed only upon initiating prescribed grazing systems and strict utilization standards.

United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VA. 22092

SEP 11 1990

Memorandum

To: Area Manager, Bureau of Land Management
El Centro, California

Through: Assistant Secretary--Energy and Minerals SEP 12 1990

From: Director, Geological Survey

Subject: Review of draft environmental statement for livestock grazing and wilderness management for the Eastern San Diego County Planning Unit, California

We have reviewed the draft statement as requested in the District Manager's letter of June 30.

7.1 We suggest that the description of the affected environment (chap. II) should include a summary description of the significant aquifers or types of aquifers to be used.

for H. William Menard

Response to U.S. Geological Survey

Response 7.1

The planned development of proposed wells and springs described in the EIS is not based on solid evidence, but on past development in the area. These indicate there is good reason to believe water is present. Prior to the development, specific well-site investigations will be conducted, at which time specific aquifers and their capabilities would be identified.

FOUNDED IN 1892

SAN DIEGO CHAPTER
HOUSE OF HOSPITALITY
1549 EL PRADO, BALBOA PARK
SAN DIEGO, CALIFORNIA 92101

To: El Centro Resource Area Manager
From: Desert Subcommittee, San Diego Chapter, Sierra Club
Re: Comments on Draft Environmental Impact Statement, Eastern San Diego County Planning Unit
Date: September 13, 1980

Thank you for providing our organization this opportunity to comment on this draft Environmental Impact Statement. Considering the temporal and budgetary limitations forced upon you, the document is an admirable one; nevertheless, we would like to make a number of statements that may clarify, or be contrary to, the conclusions set forth in the published draft report.

GENERAL COMMENTS:

In regards to the overall content and organization of the report, we found a truly impressive array of grazing and wilderness data. However, we feel that the organization of available data was roughly composed; facts seemed to appear only when necessary to justify an alternative or a land-use decision. Your index helped clarify this jumble of data, but it would have been immensely preferable to have had an "existing conditions" for the unit, covering soil, vegetation, cultural resources, grazing history, roads and other improvements, and other introductory data before the alternatives were discussed. The sections on alternatives, conflict resolution, etc. would then flow far more smoothly, becouse all the facts would be already discussed. 8.1

LIVESTOCK GRAZING MANAGEMENT SECTIONS:

The San Diego Chapter of the Sierra Club is a firm believer in the preservation of appropriate lands in a condition entirely free from cultural impacts. Nevertheless, it recognizes the historical right for cattle to graze in this area, provided that they do not degrade the vegetation, soil and water resources over the long term. As a corollary to that belief, we strongly feel that the land should be retained in the condition which existed prior to its historical degradation. The BLM wisely recognizes that many of the resources in the area have in fact been degraded by cattle grazing, and as a result, it appears to be taking steps to remedy the grazing deficiencies through policies suggested in this document.

Therefore, our organization believes that portions of both Alternatives I and IV are valid. In theory, we feel that only be allowing a longterm rest for the land (Alternative I) will many of these lands be restored to their originally lush nature. (For a description of the early historic condition of some of these lands, see the attached sheets.) Similarly, we do not insist that all grazing lands be improved, because given the relatively poor environmental conditions in the area, many of these lands were probably not very lush, even under the best climatic circumstances.

In a practical sense, however, we recognize that certain management procedures are necessary, in addition to resting the land, to restore these lands to their former "natural" condition. Periodic burning was an integral

part of the longterm ecosystem of many parts of the study area, and we recommend such procidures where historical and other data indicate the need for burning to revitalize the landscape. Our committee does not have the technical expertise to be able to scientifically evaluate whether the specific suggestions in the proposed plan will result in the predicted results. We leave that to your judgement. However, we agree with you that only by combining grazing reductions with burning will the land be best restored. Alternative IV, in comparison with the Proposed Action, slightly de-emphasizes grazing numbers, is somewhat more sesitive to wildlife populations, and does not advocate plowing and reseeding; therefore, it is to be preferred over the proposed action. We do not think the proposed action entirely unworkable. However, Alternative IV offers many ecological advantages without causing any additional economic hardships to the local ranchers. We therefore recommend Alternative IV as our preferred alternative.

8.2

PROPOSED WILDERNESS MANAGEMENT SECTIONS:

In general, our organization agrees with your tentative conclusions regarding recommendation for wilderness in the study area. We fully support your recommendations for wilderness in both the Carrizo Gorge and Sawtooth Mountains area, and applaud your recognition of the compatibility of grazing and wilderness.

We do, however, suggest a few modification from your Proposed Action (Alternative III).

First, based upon management considerations, we recognize the practical as well as ecological difficulties in presently nominating the San Felipe Hills as a WSA. However, the longterm protection of these lands is our highest concern. As a result, we recognize the ability of this semi-desert area, over the long term to heal its present firebreak scars. Moreover, we feel that we cannot accept the arguments of distance from the BLM office and poor past management control for a rationale to justify not nominating this area. We accede therefore to your present suggestion, but request that, if possible, you continue to manage the area in as close to wilderness conditions as possible until 2001. Given the limited resource potential in this area, it should not be difficult. Perhaps by that time, scars in the area, manpower shortages and other factors may have changed enough to allow its effective management as wilderness.

8.3

8.4

We have a similar feeling toward the northwestern sections in the Sawtooth Mountains area. As suggested in Alternative I, we support the eventual acquisition of Spencer Ranch, and suggest that the road to the ranch eventually be closed. However, we realize that economic factors prevent that action from being taken at the present time. In regard to those sections, we disagree with those statements in the first two paragraphs of page 1-37, because we feel that the area is currently worthy of wilderness designation. We therefore urge that area CA-060-24A remain under wilderness management until those interests at Spencer Ranch appear more willing to divest their property. We also suggest this course of action because if nearby roadless US Forest Service land (about three or four sections) is included, an area of over 5000 acres is created. To strengthen the integrity of this area, we urge that you co-operate with state authorities to acquire (or allow wilderness use of) section 36 in

8.5

T14S, R5E. We suggest that you contacg appropriate officials of the Cleveland National Forest to urge that they retain those sections of land suitable for wilderness.

We also disagree with you in regard to your recommendations for Potrero Canyon. We reluctantly agree that it is necessary to keep the two roads open into Potrero Canyon. However, we feel it is far better for these roads to be part of the wilderness area, but chained or blocked off to all but those who maintain the watering facilities. Ample legislative precedents exist for this concept, at Joshua Tree National Monument and in other areas. Conservationists do not disagree with occasionally, necessary vehicle use for maintenance purposes. We find the area of non-wilderness in the center of area CA-060-24B far more unacceptable. We strongly urge you to reconsider the proposed action in this regard. 8.6

In the same area, we find it unacceptable to lop off the proposed wilderness designation in T14S, R6E, secs. 19, 20 and 21. Because of a few random visits from off-road vehicles, which may have entered the area illegally, you should not buckle in to pressure and abandon these sections. There are hundreds of off-road vehicle play areas in the general vicinity, most of which are better suited for use than this particular site. Rather than retreat back to the southern boundary of these sections with your proposed fence, I urge you to fence instead along the road itself, and provide road closure signs along that fence. Allowing a play area in these sections will only allow further propagation of ORV trails, which will inevitably soon extend beyond the proposed fence. Please limit all ORV activities to areas well separated from proposed wilderness areas; the two activities are wholly incompatible. 8.7

Communications with your office also point out that sand and gravel resources may also exist in these sections. While organization does not profess geological or mining expertise, sand and gravel deposits in most areas are sufficiently common that should one area be placed off-limits, additional areas can be utilized. We feel that, considering the low value of these deposits and its potential for extraction elsewhere in the area, that a study be made of alternative sites prior to commencing of any extraction in this area. If absolutely no alternate nites can be found, we urge that extraction take place only under strict guidelines, and only in a prescribed, limited area.

Thank you again for giving us the opportunity for us to comment. We welcome any of your comments that may clarify these issues.

Sincerely,

Frank Norris
Chairman, Desert Subcommittee

Response to Sierra Club, San Diego Chapter

Response 8.1

We appreciate your comment regarding the format of the document. However, the EIS must conform to Section 1502 of 40 CFR (that portion of the CEQ regulations for implementation of those regulations).

Response 8.2

Preference for Alternative 4 over Alternative 3 (Proposed Action) has been expressed in other comments. Although we feel Alternative 3 meets resource needs (see responses to comments 6.1, 6.2, 6.3, and 6.4), comments such as this will be considered in the process leading to a selected course of action.

However, slight changes have been made in the proposed action and mitigation sections of the DEIS (see "Modifications and Corrections" section below). In summary, under the proposed action, no new allotment would be established and additional mitigation would provide for intensive study of possible special conflicts between bighorn and livestock.

In response to your concern regarding plowing and reseeding, three factors must be considered. First, the 400 acres proposed for reseeding are on an existing range improvement project, seeded with exotic species such as pubescent and tall wheatgrass. Second, the critical erosion condition that exists (p. 3-21, paragraph 1) warrants expedient measures to reduce soil loss to a tolerable level. Finally, wildlife observation reports have recorded deer in the area which indicates deer use these grasses in their diets. This will be far more beneficial than letting the area revegetate to dense stands of chaparral.

Response 8.3

The Wilderness Act criteria in part define wilderness "...as an area where the earth and its community of life are untrammeled by man..." and an area which generally appears to have been affected primarily by the forces of nature, with the imprint of Man's work substantially unnoticeable. Because there was a potential in the San Felipe Hills for the scars to return to a natural condition and in accordance with the Wilderness Inventory Handbook (p. 12), the area was classified as a WSA.

During the study phase, the ability of San Felipe Hills to return to a natural condition was examined. The fire history of the region's chaparral and the topography indicate a great probability that major fires will recur in the WSA. The current state of the art for fire management will deal with the cyclical fires by requiring that new firelines redisturb areas currently scarred. In addition, users of the area engaged in primitive types of recreation would be confined to the scarred area by the topography of the San Felipe Hills and the dense chaparral growth. Therefore, it is very unlikely that the imprint of Man's fires would ever be substantially unnoticeable.

Response 8.4

See Response 6.1.

Response 8.5

The Wilderness Act and the Federal Land Management Policy Act limit the Bureau's land acquisitions to situations where the owners have expressed an interest in selling or exchanging land.

Either by itself or with the addition of adjacent Forest Service land, WSA CA-060-024-A cannot be effectively managed as wilderness as long as the Spencer Ranch is privately owned. Nor does it appear likely that the Spencer Ranch will be available. Therefore, the failure of Alternative 3 to recommend acquisition of the Spencer Ranch is based upon a recognition of the inability to carry out the proposed action. If the Spencer Ranch does become available in the future, the MFP can be ammended to address acquisition. Specific Congressional authorization would then be required for the acquisition and for modification of Wilderness Area boundaries.

The area will be managed in accordance with the Bureau's Interim Management Policy and Guidelines for Lands Under Wilderness Review until Congress decides if WSA CA-060-024-A is suitable or nonsuitable for designation as wilderness. If the latter, the area will be managed as nonwilderness. Only if Congress designates WSA CA-060-024-A as a wilderness area can it be managed as wilderness with the legislative protection of the Wilderness Act.

It was suggested that the Bureau try to acquire Section 36, T. 14 S., R. 5 E., SBM. This has been recommended in MFP Step 2 and was omitted from the DEIS through oversight.

Response 8.6

Public comments have suggested that in Alternative 3 the cherry-stemmed roads in Potrero Canyon remain open for use by the grazing lessee but that they be closed to the general public. The amount of vehicular activity on these roads would be substantially reduced, thereby mitigating the negative impacts of the roads upon the lands between them. Alternative 3 has been amended so that roads in Potrero Canyon will be closed to vehicular use by the general public and the land between them recommended as suitable for wilderness designation.

Response 8.7

The Management Framework Plan (MFP) recommended that the best use for Sections 19, 20, and 21 (T. 14 S., R. 6 E., SBM) would be as a material site for sand and gravel. Since then the County of San Diego has acquired a nearby private parcel of land as a source of sand and gravel. The new material site has reduced the need for developing these three sections. Therefore, in response to this change, those portions of WSA CA-060-024B located within Sections 19, 20, and 21 would be recommended as suitable for wilderness designation in Alternative 3.

C-3 I. All Roads on U.S.G.S. & B.L.M. Maps are maintained as time & Money permit.

There are other Errors please see U.S.G.S. Map Date 1959 9.1

[illegible] 9.2
as Canbrate. there is No access past first locked gate

Kelly R Hanson
Sept 16, 1980
6971 Colorado ave
La Mesa Ca.
461-9644

Response to Kelly Hart

Response 9.1

Ways within Canebrake Canyon do appear on past USGS topographic maps. But these routes do not meet the definition of a "road," as defined in the Wilderness Inventory Handbook. Field examinations have failed to produce any evidence of regular use and maintenance.

Response 9.2

Canebrake Canyon is legally accessible with the permission of owners of private land crossed. There is no locked gate blocking access to Table Mountain.

A review by Karen Wilson, IVC Museum Society, El Centro, CA.
Proposed Livestock Grazing & Wilderness Management for the Eastern San Diego Co. Planning Unit: Draft EIS. June 1980

10

EASTERN SAN DIEGO COUNTY PLANNING UNIT - BLM

I found this document very cumbersome and very confusing.

I can appreciate the reasoning behind listing each alternative for each particular area, and for each step of the plan and for explaining each thoroughly, however, I repeatedly became lost in these explanations. Having the proposed alternative listed between four alternatives not being chosen is very confusing. Most of the time I was very unsure of what the proposed action really was.

If this document is supposed to be read by "ordinary people", much of the vocabulary is too specialized and is not listed in the glossary. There are also many words that may not be "specialized" but they are not in common everyday usage.

It is commendable that it appears to find a happy middle ground between land usage by the cattle rancher and wild life (especially deer and desert big horn sheep).

10.1 Although the plan explains exactly what is meant by cultural resources, I did not get the impression that there was any great concern for its safety and preservation unless it happened to be convenient. Cultural resources are being trampled at the present and under the proposed plan there might be greater risk to additional sites being trampled due to construction of fences, construction of watering troughs around springs, and the additional problem of their being destroyed by burns that are being planned to rid some areas of chaparral to allow grazing material to grow. There is reference to mitigating these changes but I'm not really clear about what this would involve. There is also mention of notifying local archeological societies that pottery in these areas may have received damage or changes due to these burns. Pottery dating would become impossible as the tests would be thrown off by the burns. The only protection of sites would be in areas designated as wilderness. Since it would no longer be possible to drive into some areas the sites would be protected because of inaccessibility.

10.2 Unless I have misunderstood the section on Table Mountain, they seem to be saying that while there are cultural resources present, they are not great in number or too important. When Ron May was here, he talked a little about the work he was doing in the Table Mountain area, he spoke of the area as having quite a bit of evidence of habitation. He seems to have been working in that area for quite some time and talked as though he was still finding new things. Are these the same areas?

The Impacts to Wildlife Habitat in the Appendices was much more understandable as to choices and the proposed action than the remainder of the document.

10.3 As far as I could tell, the first concern was for the grazing cattle, then the desert big horn sheep, other wildlife, off road vehicle recreation, and the last concern was for the cultural resources.

Response to Karen Wilcox

Response 10.1

This EIS is not designed to provide complete mitigation of impacts or susceptible cultural sites. For this reason, mitigation procedures outlined in the document are not complete in terms of full protection. The EIS is designed to present all reasonably possible problem situations and to provide possible solutions to identified conflicts.

Mitigation will not be implemented until the project implementation stage is reached. At this stage, each project is reviewed for its potential impact on cultural resources through environmental assessments (EAs). This usually requires a Class III inventory (which includes a record search and 100% field survey) carried out by a qualified archaeologist. If sites are discovered during the inventory, site-specific mitigation is proposed by the archaeologist and then reviewed by the Area Manager.

Since preservation in situ is BLM's mitigation of choice, most identified sites would be so mitigated. Depending upon site significance and nature of the conflict, some sites may be mitigated by surface and/or subsurface collection. Impact on pottery due to burning, for instance, may be mitigated either by avoidance of the site or systematic retrieval of all susceptible material.

Response 10.2

As evidenced on page 2-46, the Table Mountain area has been identified as having numerous sites and as being very significant archaeologically.

Response 10.3

Cultural resources, as with all resources addressed in the document, will be given every possible consideration as to their protection. From a careful review of the document, the reader will discover that all resources were given equal weight in their presentation.

COMPREHENSIVE
PLANNING ORGANIZATION

Suite 524, Security Pacific Plaza
1200 Third Avenue
San Diego, California 92101
(714) 236-5300

September 10, 1980

Gerald E. Hillier
District Manager
Bureau of Land Management
1695 Spruce St.
Riverside, CA 92507

Subject: CPO Executive Committee Action on Draft EIS
Re: Proposed Livestock Grazing and Wilderness Management for Eastern San Diego County

Dear Mr. Hillier:

On September 5, 1980, the Executive Committee reviewed your draft EIS. Based on CPO investigation of the proposed draft EIS for proposed livestock grazing and Wilderness Management the Executive Committee has determined that there are no unresolved regional issues regarding your application and that further review and comment by CPO is unnecessary.

Sincerely,

Joan K. Martin

JOAN K. MARTIN
Director, Areawide Clearinghouse

JKM:de

Routing	Date	Initls.
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Action By:		
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PROJECT NOTIFICATION

DATE: 9/5/80

ITEM No.: NI-FY80-47,48,53,54, 56,57,59-61,65,68-72, 75-80,82,197

TO: Executive Committee

FROM: Executive Director

SUBJECT: Project Notifications Submitted to Areawide Clearinghouse September, 1980

ITEM #		STAFF RECOMMENDATION
(P) NI-47	Draft Environmental Impact Statement, Proposed Livestock Grazing & Wilderness Management Program, Eastern San Diego County Planning Unit/U.S. Department of the Interior, Bureau of Land Management	NOT REVIEW

Reviewed pursuant to OMB Circular A-95, Part II
Deadline: September, 1980

The Eastern San Diego County Planning Unit Grazing and Wilderness Environmental Impact Statement (EIS) examines the impacts of implementing each of five proposed management and four wilderness suitability alternatives on 98,902 acres of public land in the East San Diego County Planning Unit.

The grazing management proposals are designed to provide intensive and less intensive management for eleven existing and two proposed allotments within the planning area covering 80,164 acres of public land. The proposed alternatives allocate forage on the basis of suitable acreage; do not allow grazing at more than carrying capacity; establish seasons, frequency, and intensity of livestock use; and provide for monitoring systems.

The four wilderness alternatives propose varying combinations of suitability and non-suitability recommendations for the five Wilderness Study Areas (WSA's) within the planning area. These alternatives are analyzed to show how wilderness designation or non-designation will have an impact on, and will be impacted by, proposed management of recreation, wildlife, grazing, minerals, and other resource values.

The grazing element was prepared first, because of a court directive requiring that an EIS be prepared to indicate the amount of grazing that can be supported. The EIS on other elements will be prepared later.

All the land lies in the unincorporated area. Eight different county offices and numerous private groups have received copies of the draft EIS. It appears that adequate public review will be possible without further review by CPO.

San Diego County Council of Gem and Mineral Societies

12

September 21, 1980

El Centro Resource Area Manager
Bureau of Land Management
333 South Waterman Avenue
El Centro, California 92243

Attention: Dave Marie

Dear Sirs:

Comments on "Proposed Livestock Grazing Wilderness Management for the Eastern San Diego Planning Unit."

Page 3-3 Vegetation Condition and Trend: Under grazing alternative 1. It will result in an overall negative impact in terms of forage production, for as you make clear and we know without range management the predominate chaparral species will outcompete perennial grass species and in these areas the composition levels of these grasses are already low. Furthermore, open stands of brush with perennial grasses between will develop into an area completely covered with the woody greasewood type chaparral in five to ten years which is not good for forage of cattle or any of the indigenous animals (deer and sheep). We have seen many areas in San Diego County where this has taken place in the last fifty years, areas almost completely covered with perennial grass species with very little chaparral that are now covered, and others that are nearly covered, and this growth of chaparral is more subject to erosion and prone to intense uncontrollable fires.

12.1 We are for controlled grazing and management of the range with a good increase in watering places of animals, indigenous and domestic, to spread range use and lessen impaction. If it is thought the presence of cattle would keep the desert mountain sheep from utilizing water provided for cattle, then additional watering places should be provided where possible in places not so frequented by cattle, such as rocky places in which a little cement would create a pseudo natural tank to collect precipitation, natural run-off, or water of springs.

12.2 We think a wilderness area should not necessarily be precluded from having domestic cattle present nor do we think it should be precluded from having water developed for the indigenous animals - desert mountain sheep, deer, and all other indigenous animals as well as cattle. At times dry conditions can lower the desert mountain sheep population and additional means of obtaining water other than natural can only help them to survive.

12.3 We think mechanical means must be permitted to care for watering places, and the range where needed (wilderness or not). It is nearly impossible to carry an injured animal of 200-2,000 lbs. on the pommel of a saddle, and a few sacks of cement are a little unmanageable on that same pommel.

Page 3-9 Soils: Grazing alternative 2: If proposed development and management will give the improved vegetative cover (i.e. forage) as stated, then let it be so.

12.4 In reference to statement - "Where these structures (i.e. troughs and drinkers) are located on slopes of 30 degrees or more, erodability will fall in a severe class", we have never seen such structures placed on that steep of a slope, and such should be prohibited except in rocky areas not subject to erosion such as prime places for pseudo natural tanks. Water can be piped from development to a lesser slope.

We, the members of the San Diego County Council of Gem and Mineral Societies request the rockhounding collecting areas open to the rockhounds, and those studying the earth sciences, on roads and trails used by ranchers - the gates open to the rockhound, if necessary by permit, where there is collecting - prefer not to always have to have a permit.

12.5 These collecting areas are:

Southeast McCain Valley (In-ko-pah allotment)

Southern Corrizo Gorge (Mt. Tule allotment)

Table Mt. (Tierra Blanca allotment)

We would not like any idea of increasing herds of desert mountain sheep for hunting purposes (i.e. Arizona).

San Diego County Council of
Gem and Mineral Societies

Clarence A. Ritter

Mailing Address:

Clarence A. Ritter
125 Corte Maria Avenue
Chula Vista, Ca 92010

Response to San Diego County Council of Gem and Mineral Societies

Response 12.1

We agree, and implementation of the Wildlife Habitat Management Plan is already underway to provide the type of watering areas you mentioned.

Response 12.2

Page 1-41, paragraph 1, explains that wilderness and livestock grazing are not mutually exclusive and that the intention of establishing wilderness is not to preclude livestock grazing.

Response 12.3

As indicated by paragraph 2, page 1-37, mechanical means to care for watering places and range would be permitted in the wilderness areas.

Response 12.4

There was some misinterpolation with developing water sources in 30 degree slopes. Page 3-9, paragraph 3 refers to the erosion problem that would occur if water sources were developed on slopes greater than 30%, not 30 degrees. A 30% slope is approximately a 15-degree slope, which is considerably less than the figure you are concerned with. Concern for development of project proposals on steep slopes has been addressed by mitigation number 5, page 3-39.

Response 12.5

None of the three rockhounding collection areas would be affected by wilderness designation as all are outside the boundaries of WSAs proposed as suitable for wilderness designation.

United States Department of the Interior

HERITAGE CONSERVATION AND RECREATION SERVICE
PACIFIC SOUTHWEST REGION
SAN FRANCISCO, CALIFORNIA 94102
450 Golden Gate Avenue Box 36062

IN REPLY REFER TO:

PSW 200
DES 80/46

SEP 17 1980

Memorandum

To: District Manager, Bureau of Land Management, Riverside, California

Attention: El Centro Resource Area Manager

From: Chief, Environmental Services Division, PSWRO

Subject: Review of Draft Environmental Impact Statement on proposed livestock grazing and wilderness management for the Eastern San Diego County Planning Unit.

We have reviewed the document and offer the following comments for your consideration.

13.1 Discussion of cultural, recreational and natural resources and impacts appears to be adequate. Mitigation measures to protect significant cultural resources (Numbers 11-14, p.3-40) should be approved by the State Historic Preservation Officer (Dr. Knox Mellon, California Department of Parks and Recreation 916-445-8006). Written evidence of compliance with Section 106 of the National Historic Preservation Act, as amended, should be included in the final environmental statement.

13.2 Purchase of the Spencer Ranch, presented in Wilderness Alternative 3, includes the removal of all buildings and restoration of the site to conditions approximating the surrounding landscape. A determination of the possible historical significance of the Spencer Ranch structures should be included in the final environmental statement. An approximate schedule for purchase of the Spencer Ranch property should also be identified, including potential funding sources.

We believe that the final document should also include an implementation schedule for the wilderness alternatives, including development of proposed hiking trails.

Thank you for the opportunity to comment.

cc: Regional Environmental Officer, PSWR,
Office of the Secretary, USDI
DECR,HCRS,WASO,W750

Response to Heritage Conservation and Recreation Service

Response 13.1

Mitigation measures to protect significant cultural resources will be approved by the State Historic Preservation Officer. However, the DEIS does not provide complete mitigation of impacts on susceptible cultural sites. There are numerous project proposals in the DEIS that will require site-specific environmental assessments before implementation. Specific mitigation will be included in these EAs. At that time, a copy of the project cultural resources (in accordance with Section 106 of the National Historic Preservation Act, as amended) will be sent to the State Historic Preservation Officer for approval. It is not within the scope of this EIS to include cultural resource mitigation for every project proposal.

Response 13.2

Acquisition of Spencer Ranch has not been proposed under wilderness alternative three.

IN REPLY REFER TO:
Land Operations

14

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF INDIAN AFFAIRS

Southern California Agency
5750 Division Street, Suite 201
Riverside, California 92506

September 19, 1980

Mr. Dave Mari
El Centro Resource, Area Manager
Bureau of Land Management
833 South Waterman Avenue
El Centro, California 92243

Dear Mr. Mari:

As Superintendent of the Bureau of Indian Affairs, Southern California Agency, we hereby acknowledge receipt on September 10, 1980, of the "Draft Environmental Impact Statement----for the Eastern San Diego Co. Planning Unit", relating to property involved in the above entitled Report.

As mentioned in the letter from the Riverside District Office, dated June 30, 1980, transmitting the "Draft" report, the report is based on information from sources other than the Bureau of Land Management. The impact of archeological resources has been presented to the tribal leaders. We anticipate that any of these resources will be carefully taken into account prior to any improvements.

As to the grazing alternatives, it appears on the map that the Tierra Blanca Allotment is adjacent to the Manzanita Indian Reservation and the Tierra Blanca and In-Kop-Pah Allotments are adjacent to the Cuyapaipe Reservation. In our opinion, the mitigation measures proposed to reduce grazing and perform certain range improvements in the draft are adequate. We see no impact on the adjacent reservations.

As to the Wilderness proposed action, it appears on the map that the San Ysidro Wilderness Study Area is adjacent to the Los Coyotes Indian Reservation. It is our opinion that the mitigation measures proposed in the draft report fails to treat with, or adequately answer certain circumstances referred to in other portions of the report such as access and fencing. The report mentions fencing to be done on certain allotments but there is no indication as to exactly where the fences will be placed. Wherever Indian lands adjoin your Allottments, fencing may be needed. However, since the proposed action alternative recommends that all of the acreage within the San Ysidro Mountain be designated non-suitable for Wilderness (the report does not indicate what will happen to this area), we see no direct impact to the Reservation.

I hope the above will be helpful to you in your continuing study of the proposed project.

Sincerely,

Superintendent

cc: Land Operations/SAO
Bureau of Land Management,
Riverside

AtlanticRichfieldCompany 555 Seventeenth Street
Denver, Colorado 80217
Telephone 303 575 7577

J. R. Mitchell
Public Lands Coordinator

15

September 18, 1980

Area Manager
El Centro Resource Area
Bureau of Land Management
833 South Waterman
El Centro, California 92243

Re: Eastern San Diego County Planning Unit

Dear Sir:

Atlantic Richfield Company appreciates the opportunity to comment on the Bureau of Land Management's (BLM) Draft Environmental Impact Statement (DEIS) on proposed Livestock Grazing and Wilderness Management for the Eastern San Diego County Planning Unit in California.

Atlantic Richfield Company believes that the planning unit has potential for geothermal resources, though these resources are only briefly mentioned in the DEIS on Pages 11 to 15. We support effective multiple-use management plans and actions that provide for the necessary protection of the environment while, at the same time, providing for the development of natural resources. We strongly recommend that the geothermal resource potential be carefully evaluated throughout the area and those areas with potential be exempted from wilderness designation. Additionally, the final management plan should provide for and encourage exploration and appropriate development of geothermal resources.

The area being considered in the DEIS is located on the western margin of the Imperial Valley, a unique high temperature geothermal province that contains several geothermal fields that have the potential for providing energy for the generation of electricity for use in the Los Angeles Basin. The western faulted margin of the Imperial Valley geothermal province cuts through portions of the proposed Wilderness Management Unit (WMU). Hot springs are located along this fault within the proposed WMU. Additionally, portions of the area have been classified by the United States Geological Survey as being potentially valuable for the development

of geothermal energy (see enclosed map). From the foregoing, we believe that the area possesses geothermal potential and that it could make a contribution to the nation's domestic energy supplies, thereby reducing our dependence on foreign imports. Accordingly, we recommend that the BLM fully inventory this potentially valuable resource and exempt those lands that have potential from wilderness designation. 15.1

In summary, the final EIS/Management Plan should fully recognize the geothermal potential within the entire planning unit and provide the necessary access and rights-of-way to insure and encourage exploration for and appropriate development of this potentially valuable alternate form of energy. Electricity generated using energy from a local geothermal resource, such as within this unit, is one step toward our nation's goal of increasing our energy self-sufficiency. 15.2

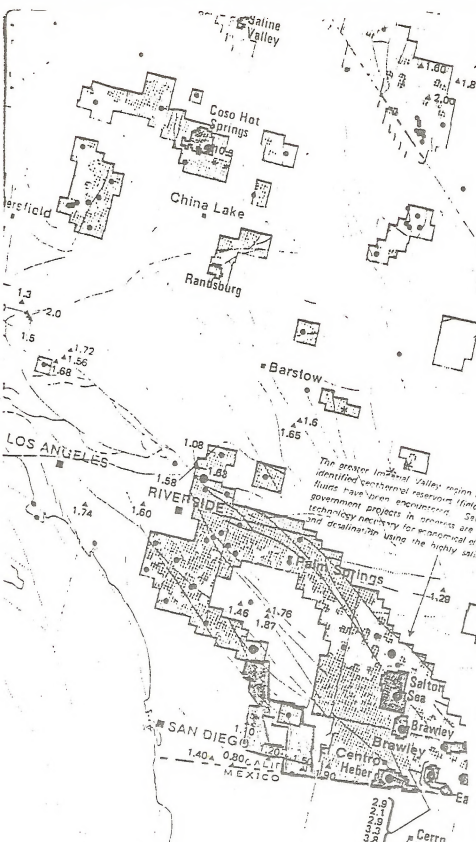
Again, we appreciate the opportunity to present these comments to the BLM on this issue. If you need any further information, please don't hesitate to contact us.

Sincerely,

Jay R. Mitchell

J. R. Mitchell

JRM/bbf
Attachment



Geothermal Energy Resources of the Western United States by Paul J. Grim. National Geophysical and Solar-Terrestrial Data Center, Boulder, Colorado, 1977.

Areas classified as Known Geothermal Resources Areas (KGRA). [See L. Godwin, L.B. Haigler, R.L. Rioux, D. White, L.J.P. Muffler, and R.G. Waylan "Classification of Public Lands Valuab for Geothermal Steam and Associated Ge thermal Resources," Geological Survey C cular 647 (1971)]. Data taken from U Geological Survey Conservation Divisi maps (scale 1:500,000). In general, bou aries shown are those in existence in m 1976 and are subject to change.

Areas classified as be valuable prospectively geothermal steam and associated geothermal resources. Refere and source of data same as for KGR above. Likewise, in general, bounda shown are those in existence in mid-1

Response to Atlantic Richfield Company

Response 15.1

If the Atlantic Richfield Company has data which would assist us in considering the geothermal potential of the area, we would appreciate receiving it. Thus far, no interest has been expressed in conducting geophysical/geochemical exploration or in leasing any of the subject lands. We consider it unlikely that much interest will be shown in the area in the timeframe covered by the land-use plan (about 20 years). Nevertheless, new data can always lead to a change in a dynamic process such as land-use planning.

The geothermal resource potential was evaluated through the land use planning process. This evaluation was based on available data from published sources such as the Geological Survey (GS). Two areas identified by GS as prospectively valuable for geothermal resources occur in the planning area. The GS determination was based largely on the presence of two hot springs--one near Jacumba and the other near Agua Caliente. The available data, as well as the lack of any industry interest in conducting geophyisical exploration in the area, were considered in the proposed planning decisions. Considerable additional work would have to be done to demonstrate that either of these areas has commercial quantities of geothermal energy.

In addition to the land-use planning process, the Wilderness Act requires that GS and the Bureau of Mines conduct mineral surveys and prepare a report for Congress on each area recommended as suitable for wilderness designation. This report will include an assessment of the geothermal potential.

Our planning decisions on wilderness are recommendations to Congress. Only Congress can designate an area for inclusion in the national wilderness preservation system. The BLM cannot "exempt" areas from wilderness designation because of their energy potential.

Response 15.2

The proposed plan, to the extent possible, provides for geothermal exploration. The EIS addresses only the impacts of grazing and wilderness on other resources; it does not address all of the decisions proposed in the land use plan. The decisions on geothermal energy are summarized as follows:

1) Jacumba--Most of the resource is on private land. The bulk of the public land is available for exploration under a notice of intent. If exploration results are promising, leases could be issued following an environmental assessment and consideration of the new data through the land use planning process. At present, there has been no industry interest in exploration or leasing, and consider the potential to be much lower than that of the geothermal reservoirs in Imperial Valley. About two sections of land in this large prospectively valuable area fall within the recommended wilderness area in Carrizo Gorge.

Response 15.2 (cont.)

2) Agua Caliente--Although about 12 sections of land in this prospectively valuable area fall within the recommended Sawtooth Wilderness Study Area, the same general comments for Jacumba apply here. Much of the area lies within the Anza Borrego Desert State Park or on private land. The hot spring itself lies within the park. There has been no industry interest in the area. Geothermal potential appears to be much lower than in other areas such as Imperial Valley. Exploration could be conducted under a notice of intent. In sensitive areas, leases would be issued only after an environmental analysis and assessment of the geophysical data indicate that such action is warranted.

16

SIERRA CLUB

Southern California Regional Conservation Committee

43730 Higbee
Lancaster CA 93534
Sept 19, 1980

El Centro Resource Area Manager
Bureau of Land Management
833 South Waterman Ave
El Centro CA 92243

Sir:

I would like to comment on the draft EIS on proposed livestock grazing and wilderness management for the Eastern San Diego County Planning Unit. These comments are supplemental to those submitted by Frank Norris from our San Diego Chapter and Russ Shay, our California-Nevada Field Representative. My own area of interest is your wilderness proposals, and I will restrict my comments to that portion of the draft. I am concerned about the recommendations for non-wilderness in the Proposed Action, particularly for WSA CA-060-24A and the Potrero Canyon area.

16.1 Your rationale for excluding the northwestern portion of the Sawtooth Mountains is based on the difficulty of managing it as wilderness if you do not acquire the Spencer Ranch. First of all, no rationale is given for the decision not to acquire Spencer Ranch. If no funding is available for immediate acquisition, consideration should be given to seeking a land exchange for some of the other scattered BLM holdings in San Diego County which are being separately proposed for disposal. The relatively small acreages involved should simplify this administrative process. This unit's wilderness potential is especially enhanced when considered in context with the U.S. Forest Service lands around Garnet Peak, which provide a wilderness quality connection with the remainder of the area in the Sawtooth Mountains that is recommended for wilderness.

Manageability problems are the second reason given for non-wilderness here. I believe this should not be given the weight it apparently is, for reasons I will discuss further below.

16.2 The Potrero Canyon area has problems in two areas in the Proposed Action: the exclusion of Sections 19, 20, and 21 and the establishment of a non-wilderness corridor up Potrero Canyon itself. The rationale for excluding the first area is that better management can be obtained by using a proposed fence line along section lines. I totally disagree with this assumption. If you are seriously concerned about ORV trespass, you will do far better to put your boundary up along the road where such violations will

be immediately apparent; not hiding it back in the brush where there is free access up to the line, and no easy evidence of violations. It has been my observation in the past that, unless there are obvious natural boundaries, road boundaries are far and away the most manageable.

The Potrero Canyon problem arises from two sources: the decision to "cherrysystem" the two roads up the canyon to keep them open for public use, and then the determination that the area between them would have management problems and limited suitability for wilderness. My understanding is that the primary call for these routes is to permit access for relatively infrequent (annual or semi-annual) maintenance of stock facilities that requires a
16.3 vehicle. Under these circumstances, the obvious solution is simply to close the routes where they enter the WSA in Section21 with a locked gate, and permit entry by the grazier holding the allotment as necessary for maintenance. This is compatible with wilderness designation (as acknowledged on page 1-41 of the draft) and should simply be written into the management plan for the unit. While this would result in some loss of access, it would only be about three miles of relatively easy terrain. In view of the fairly small size of the WSA (only about five miles across) this is not critical to use of the area for wilderness-oriented recreation.

The general concern which your office seems to have with potential ORV enforcement problems seems excessive. You should consider some of the following factors, and take another look at this issue. There is no shortage of alternative places for ORV's to go in eastern San Diego County. Most of these areas are at least as attractive from an ORV recreational perspective.
16.4 Most of these areas are easier to reach than the wilderness areas being proposed here. Finally, one of the most encouraging observations we have made of recent wilderness designations (primarily the Golden Trout in the southern Sierra Nevada - a traditional ORV use area) has been the high level of adherence to ORV closures. There have been only scattered violations of closure sign, and the incidence of such events has shown a steady decline since implementation. This seems to be a sign that you may be too pessimistic in your assessment of how law-abiding the general public is (even ORV users).

Please do not take these comments as a negative response to your planning efforts. In general, I believe your recommendations in the Proposed Action are excellent; and I wish to make clear our strong support for your wilderness boundaries for the Carrizo Gorge area and the rest of the Sawtooth Mountains and Canebreak Wash areas. We are supporting the decision to include the McCain Valley area (this Planning Unit) in the CDCA, and feel this planning effort is an excellent adjunct to the current Desert Plan.

Please keep us informed as to the final disposition of this management plan.

Sincerely,

James L. Dodson

JAMES L. DODSON
Chair, Desert Committee

Cy to: Gerry Hillier

Response to Sierra Club, Southern California Regional Conservation Committee

Response 16.1

See Response 8.5.

Response 16.2

See Response 8.7.

Response 16.3

See Response 8.6.

Response 16.4

Additional information regarding ORV problems has been added to page 1-38 (see "Modifications and Corrections" section.) Table I-13 (p. 1-45 through 1-49) states the specific number of miles of ORV use that will be eliminated under each alternative and the resultant increase in walking distance. This is a minor reduction in available ORV trails. The adjacent Anza-Borrego Desert State Park provides 400 to 500 miles of trails to ORV users (Ken Smith, pers. comm., April 11, 1980). These are some of the least used trails in the region. Further, no existing road has been recommended for conversion to a riding/hiking trail.

United States Department of Agriculture
Soil Conservation Service
2828 Chiles Road
Davis, CA 95616
(916) 758-2200

September 16, 1980

Mr. Gerald E. Hillier
Riverside District Manager
Bureau of Land Management
1695 Spruce Street
Riverside, CA 92507

Dear Mr. Hillier:

The Soil Conservation Service has reviewed the draft environmental impact statement on the Proposed Grazing and Wilderness Management for the Eastern San Diego County Area. We offer the following comments.

The EIS failed to address the prime land, if any, which may be affected.

17.1 Although the practices applied will be minimal, no mention is made of methods to be employed to control erosion during construction. The impact, if any, on wetlands is not mentioned. There appears to be some confusion as to whether "riparian habitat" refers to wetlands; the former term is mentioned in the report, but the latter term is not.

In addition, we feel your report would be strengthened by resolving the following points.

17.2 The definition of "range condition" appears to differ from that used by authors of various commonly used publications. This definition seems to be synonymous in your report with the term "ecological condition", which is not defined. Your use of "ecological condition" infers degree of departure of the vegetation composition and yield from the climax. If this inference is so, these terms cannot be synonymous. We feel this confusion should be clarified.

17.3 The definition of "apparent trend" does not appear to correspond with familiar concepts. In addition, we would suggest defining two more terms: "forage condition", and "soil surface factor."

We appreciate this opportunity to review and comment on this management study.

Sincerely,

J. H. Hansen for
FRANCIS C. H. LUM
State Conservationist

cc: Norman Berg, Chief, SCS, Washington, D.C.

Route	Date	Init's.
1		
2		

cc: A. M., Bl Centro

Response to Soil Conservation Service

Response 17.1

The resource inventory process did not identify any wetlands on public land nor does the San Diego County Soil Survey (SCS). Riparian habitat refers to a specific environment including vegetation on or adjacent to a water supply. Typical vegetation includes woody species such as cottonwood, sycamore, willow, and catclaw, with a low composition of sedges, wildrye and native clovers. This differs from wetlands which are largely made up of sedges, wildrye, and native clovers.

Response 17.2

Further clarification of the process for determining range condition can be found in the "Modifications and Corrections" section, below.

Response 17.3

Since actual field data on "apparent trend" were not collected at the same time the vegetation inventories were conducted, it is fair to say that our method of determining "apparent trend" does deviate from the familiar concepts. Briefly, page 2-21 says that "forage condition" (see "range condition" in "Modifications and Corrections" section for detailed procedures and definition) determined from the 1975 forage condition survey was compared to the "forage condition" determined from the 1978 vegetation survey (using the same procedures outlined in the 1975 survey). This allowed a determination of trend (upward, downward, or static) for the desirable, intermediate, and least desirable forage species.

SIERRA CLUB
530 Bush Street, San Francisco, California 94108 (415) 981-8634

9/22/80

Dick Mari
El Centro Resource Area Manager
Bureau of Land Management
833 S. Waterman Ave.
El Centro, CA 92243

COMMENTS ON PROPOSED LIVESTOCK GRAZING & WILDERNESS MANAGEMENT FOR THE EASTERN SAN DIEGO CO. PLANNING UNIT DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Mari,

I am submitting the following comments as CA-NV Representative of the Sierra Club. They are intended to supplement the comments submitted by Frank Norris for the Sierra Club San Diego Chapter and by James Dodson for the Sierra Club Desert Committee.

I have closely followed the development of the Bureau's land use planning and wilderness programs since the passage of the Federal Land Policy and Management Act, and have gone over the Eastern San Diego DEIS in detail because,as one of the Bureau's first attempts to deal with grazing management and wilderness suitability questions together, this EIS marks an important milestone in both programs.

In summary, my major concerns with the DEIS are:
--it does not adequately present the procedural and legal context of the proposed actions;
--it fails to adequately describe and discuss the wilderness attributes and qualities of the individual Wilderness Study Areas (WSAs) dealt with; and
--the information presented on the effects of wilderness recommendations or designations on the grazing management proposals (and vice versa) is inadequate and in some cases inaccurate.

I hope the following detailed comments will be helpful to you and your staff. I would be more than happy to discuss any of these points over the telephone if that would be helpful.

WILDERNESS STUDY CONSIDERATIONS--

18. The DEIS unfortunately does not do enough to place its treatment of wilderness questions in the context of the Bureau's planning system or of the requirements of the law. The treatment of wilderness begins with the presentation of alternative suitability recommendations (I-30), without any prefatory remarks about the legal mandate for wilderness study in FLPMA

or exactly how this EIS fits into the wilderness review process the Bureau has promulgated from its Washington, D.C. office.

Those who have followed the wilderness program in the Eastern San Diego Co. unit are probably aware of what steps have already taken place (inventory, identification of WSAs, etc.), but even they still need to be told what further steps will follow finalization of this EIS, and on what schedule.

Of particular concern is whether this EIS fully meets the requirements of wilderness study set out in Bureau policy and law; specifically the requirement for mineral study. If further mineral study is needed, when will it be done, and by whom?

Some misleading statements are made about the context of the decisions to be made with this EIS. The DEIS seems to imply that a Bureau decision that an area is not suitable for wilderness can lead to BLM actions that will negatively affect that area's wilderness qualities (3-49, paragraph 3). It should be emphasized that only Congress can rescind interim management protection of an identified WSA, regardless of the Bureau's decision on its suitability. This is a very important and clearly legislated feature of FLPMA's wilderness review provisions.

The DEIS also assumes some policy positions on wilderness management on which the Sierra Club believes the DEIS is in error. These are:

--The DEIS repeatedly maintains that fire management activities--and in particular, controlled burning--are restricted in WSAs or wilderness areas (1-42, 3-48,55,54,56, and 64). Section 4(d)(1) of the Wilderness Act clearly gives the Secretaries of Agriculture and the Interior the authority to take "such measures as ... necessary in the control of fire." In the Endangered American Wilderness Act legislative reports, Congress reiterated its intention that this provision should be broadly interpreted by the agencies, and in the current Congress the House Interior Committee report on H.R. 7702, a California 18.2 wilderness bill, the committee states that it "believes that prescribed burning could prove to be an especially significant fire presuppression method," states that "controlled burning initiates a process of nature in a planned manner and may have the advantage of producing fewer long term adverse impacts" than other fire control measures, and states that "the Wilderness Act permits the Forest Service to utilize any and all measures necessary to control wildfire, or the threat of fire, in wilderness areas." (p. 37, House Report 96-1223).

The Sierra Club wholeheartedly maintains that fire is a natural and essential component of the chaparral ecosystems which make up a large percentage of the DEIS area, and that with the help of input from visual resource management specialists and others, prescribed burning by BLM would be fully compatible with wilderness designation in this area.

We request the BLM to alter its treatment of prescribed burning in the DEIS to reflect the expressed Congressional intent in this matter.

--The DEIS states that "wilderness designation may inhibit scientific investigation of cultural sites" (III-54). This is misleading, as it is my understanding 18.3 that contemporary archeological and agency practice is not to excavate cultural sites unless they are severely threatened. Since such threats are usually due to human activities prohibited in wilderness, it is unlikely that wilderness designation would actually adversely affect scientific investigation.

Adverse effects on non-disruptive investigation of cultural resources should not be significant.

--The DEIS's assertion that distance of a WSA from the Resource Area office is a significant factor in the area's manageability as wilderness is inappropriate and runs counter to section 2(b) of the Wilderness Act which states that "no appropriation shall be available for the payment of expenses or salary for administration of the National Wilderness Preservation System as a separate unit nor shall any appropriations be available for additional personnel stated as being solely required for the purpose of managing or administering areas solely because they are included within the National Wilderness Preservation System." It was clearly the intent of Congress that wilderness areas not be subject to a higher standard for management than non-wilderness lands. 18.4

The idea that increased on the ground presence would be needed to manage these areas as wilderness is also largely inconsistent with the practical experience of the Forest Service (cf. James Dodson's comments on ORV closure of the Golden Trout Wilderness in the southern Sierra). 18.5

At the least, a judgement of unmanageability is highly questionable in the absence of a wilderness activity management plan, and is probably more a question to resolved there than in this EIS.

--The DEIS maintains that no new allotments can be established in wilderness areas after their designation (1-41). While this is consistent with the language of the Wilderness Act, I want to be very careful that there is no confusion of this prohibition with a prohibition against establishing new AMPs in wilderness or otherwise changing management of existing grazing in wilderness areas, including changes in stocking rates. 18.6

The DEIS's major weakness in assessing the impacts of various wilderness alternatives is its failure to identify the specific wilderness resources of each WSA. There is no adequate description of the specific wilderness attributes of the WSAs or of their potential contribution to the National Wilderness Preservation System.

Without such specific information, assessment of the impact of the loss of these wilderness resources (under nonsuitability recommendations) is largely pro forma and meaningless. It is not adequate to treat such impacts simply as the loss of an abstract quality, "wilderness", that is no different no matter where or how it is found (cf. 3-64). This issue is dealt with at length in the decision of the Federal district court in California v. Bergland regarding the Forest Service RARE II program. 18.7

Site specific information is essential to evaluation of each alternative regarding its contribution to a representative NWPS, its ability to meet local, regional, and national demands for wilderness and wilderness recreation, and its preservation of scientific, geological, ecological, cultural and other "supplemental" wilderness values.

This lack of specific information compounds several other problems with the treatment of wilderness in the DEIS. These are:

--The EIS fails to display how the WSAs fit (or did not fit) the suitability criteria used in the planning process. The criteria were (at least partially) set out (I-31), but their specific evaluation was not.

--The EIS should also show how the intermediate wilderness alternatives were constructed (those between the "no wilderness" and "all wilderness" options). Were different suitability criteria used for each different alternative?

The Sierra Club would support legislative provisions to permit use of motorized equipment where necessary to develop water sources for the benefit of bighorn sheep in wilderness areas in this planning unit.

GRAZING MANAGEMENT CONSIDERATIONS--

While the size of this planning unit is relatively small, this DEIS decides many of the same sorts of important and politically controversial issues of grazing management the Bureau has had to deal with in far larger units.

It is clear from the information presented in the DEIS that current stocking levels and management are incompatible with the area MFP and with national policies established both by the Bureau and by Congress for our public rangelands.

18.8 The Sierra Club supports expansion of bighorn sheep range within this planning unit and for this reason supports adoption of alternative 4 (limited use). This alternative provides the best balance of the varied multiple-use resources of the area. The proposed action (alternative 3), while a great improvement over the status quo, provides too little margin to assure successful maintenance of a viable bighorn population in this area, where adverse circumstances such as drought and wildfire are an expected part of the environment.

For the benefit of a wide variety of wildlife, we also support maximum protection of riparian areas by exclusion of livestock or provision for prescribed grazing only, under strict utilization standards. This would not preclude diversion of some waters outside of riparian zones for cattle use.

18.9 There are several problems with the economic analysis of the grazing alternatives. The foremost is the lack of cost-benefit analysis. Such analysis is essential in deciding how intensive a management scheme is appropriate to this area. The Bureau has (from its Washington, D.C. office) repeatedly assured the public that it will incorporate such analysis in its range EISs, and I hope such analysis will be incorporated in the FEIS. The DEIS does not even contain a list of the projected costs of the varying alternatives. Without this information the public cannot realistically assess the practicality and implementability of the alternatives.

This is of particular concern because I received the impression that a great deal of money will be required to support a relatively small increment of additional livestock use in alternative 2 over alternative 3 and in alternative 3 over alternative 4.

18.10 I am also interested in seeing any information on positive economic impacts of lower stocking rates (i.e., higher calf weights, etc.).

Another major problem with the impact analysis is the confusion of fire management alternatives with other grazing manag-ement actions. For example, the statement that "the overall results of the no grazing alternative would be a declining trend" (3-3) is highly misleading, as it masks the fact that this negative impact is due not to cessation of grazing but to an unrelated, unnecessary, and arbitrary decision to forgo prescribed burning in this alternative (cf. 3-10).

18.11

Another problem is the lack of standards used for determining range condition and trend. This is particularly troublesome because the DEIS seems to be talking of "forage condition" of these lands rather than the "ecological condition" standards which are used in many other BLM range EISs and which are being promoted by the SCS. This particular area points out some of the problems with this latter system, as many of its lands are chaparral types which cycle successions rather rapidly, making management for climax communities somewhat senseless.

Site specific analysis is also needed for proposed land treatments.

8.12 Of particular importance in figuring our a proper role for livestock grazing in this environment is the length of time a forage-rich environment can be maintained between treatments.

More information is also needed on the allocation of ephemeral forage in the EIS area. Ephemeral forage allocations could, if abused, undo all

18.13 the value of the planning that has gone into this EIS. I would like the EIS to include specific procedures and methodology for determining ephemeral production and allocating its use. Certainly analysis is needed of such practices as letting livestock movement dates fluctuate between 10-14 days before or after scheduled dates (I-27).

8.14 The impact of ephemeral forage allocation on forbs, plant communities, wildlife, and on perennial forage species needs to be addressed in the EIS.

The Sierra Club believes it would be in the best interest of the public lands and their management for the Bureau to make the establishment of permanent range transects an integral part of its proposed management plan.

8.15 The Bureau should, furthermore, make a serious commitment to maintain these transects regardless of any future perception by managers that they are no longer necessary. The management of an area can be no better than the information base the manager has.

The DEIS does not present information on actual use in the EIS area, though obviously this is key to assessing the environmental and economic

8.16 impacts of the various proposals. We request presentation of the best available information on actual use, and on the history of grazing use in the EIS area, as well as comparison with the 4,430 AUM licensed use figure.

The DEIS contains a fairly good explanation of the deferred rotation system proposed, and of the Bureau's rationale for this choice (I-24). It would help the EIS if some alternatives were discussed and analyzed as well. The EIS could also have done more to explore alternatives to the implementation of a deferred rotation system (e.g., one with more herding and less fencing). 18.17

One final question on the grazing alternatives--how is a lessee chosen for new allotments? 18.18

WILDERNESS/GRAZING INTERACTIONS

Treatment of the effect of the wilderness alternatives on the grazing alternatives, and vice versa, seems to have been avoided rather than tackled in the DEIS. Table III-12 seems to have been intended to address this issue, but it is very confusing and difficult to understand.

Nowhere does the DEIS state whether any or all of the grazing alternatives are fully compatible and implementable under the wilderness alternatives. The situation is further muddled by the Bureau's mis-statements regarding controlled burning in wilderness areas. 18.19

OTHER CONCERNS

-- The DEIS admits to lack of information needed for management of rare plants (I-55): the proposed actions should outline actions by the Bureau to gather needed information. 18.20

-- What is the source of the 3.45 tons/acre erosion standard used to define unacceptable erosion? 18.21

-- Conflict resolution is the core of the planning process. Table I-14 is perhaps the most informational part of the DEIS, but it suffers from a lack of explanation of the rationale for the decisions made (i.e., why was one MFP recommendation chosen over another?). 18.22

Thank you for your attention and for your efforts to plan the best possible management for our public lands.

Sincerely yours,

Russell Shay
CA-NV Representative

Response to Sierra Club

Response 18.1

Additional information regarding procedural steps in the wilderness process has been included in the "Modifications and Corrections" section below, as an addition to page 1-32.

Response 18.2

Statements regarding fire management activities in WSAs were in error and have been corrected (see "Modifications and Corrections" section).

Response 18.3

Although wilderness designation may inhibit scientific investigation, the degree of impact would be slight. Most archaeological investigations are now conducted using nondestructive techniques, such as field survey, records and literature research, and surface sampling of archaeological material.

Granted, the wilderness designation would make the area here accessible (due to motor vehicle use restrictions) but such inaccessibility could easily be obviated by the use of horses or mules. For the serious researcher, the restriction on motor vehicle use would probably not pose a problem.

Response 18.4

See Response 6.1.

Response 18.5

See "Modifications and Corrections" section, revision of paragraph 1, page 1-38, below, for additional information regarding manageability problems.

Response 18.6

Proposed New Allotment B has been eliminated from the proposed action. Furthermore, we acknowledge that AMPs can be established in wilderness areas. See "Modifications and Corrections" section, below.

Response 18.7

Additional information specific to each WSA has been added to the EIS. See the suitability criteria matrix in the "Modifications and Corrections" section, below

Response 18.8

This recommendation has been made in other letters. See Responses 6.2, 6.3, 6.4, and 8.2.

Response 18.9

Cost-benefit analysis is prepared on detailed management plans (AMP) after the EIS and land-use decisions have been completed. As a result, no cost-benefit analysis is available for inclusion in this document.

The estimated costs of implementation are shown in Tables I-4, I-7, and I-10.

Response 18.10

We have no reliable data on existing livestock performance or on changes which might result from lower stocking rates. To realize any potential benefits, livestock operators would initially have to reduce their use of these allotments. Net economic benefits would only result if the discounted increased future revenues exceeded the discounted increased costs and reduced revenues which would result in the near term. Increased weight on fewer calves may result in less revenue, not more, when compared to existing conditions.

Response 18.11

The statement regarding declining trend under no grazing is not meant to be misleading. This statement contends that there would be a declining trend (almost exclusively in the chaparral communities) in the production of desirable livestock forage, which should not be related to a declining trend in the ecological condition or movement of the vegetative community towards climax. Responses 17.2 and 17.3 discuss the terms "range condition," "forage condition," and "trend" and how they are used in the EIS.

Paragraph 1 states the implementation of this alternative (with no burning and/or grazing) would benefit the vegetative resource in its own right and thus the ecosystem as a whole.

Management to achieve climax in chaparral communities is not the objective of the proposed action. Prescribed burning of suitable lands is recommended to maintain these communities in a fair to good "forage condition." This means that the chaparral zones treated with fire would be maintained in the lower to middle stages of succession, resulting in ratings of fair to poor ecological condition (climax).

Response 18.12

The best information on the length of time an area can support a forage-rich environment comes from the Mendocino National Forest (Grindstone Burn Project). Economic analysis has shown that 7 years after the initial burn, the area returned to the productivity levels that existed prior to the treatment. Research on prescribed burns in the Laguna-Morena Demonstration Area, Cleveland National Forest, generally agrees with the Mendocino findings, although soil and climatic differences between the two may result in small variations in response time (L. Murray and L. Wright, U. S. Dept., Ag., USFS, Mendocino National Forest, and Calif. Dept. Fish and Game, 1980). Therefore, using the best information available, we estimate we would have to retreat burned areas approximately every 7 years to sustain the high levels of forage productivity described in the DEIS.

Response 18.13

The determination of ephemeral production will be in accordance with BLM 4412 Manual, which has been included in the FEIS as Appendix A, Section 4 (see "Modifications and Corrections" section). As mentioned on page 1-27, paragraph 1, a minimum of 200 pounds. of production per acre will be required before allocations are made to livestock. This was determined from information provided by universities and BLM biologists on forage requirements for nonungulates. The 200-pound. restriction is believed to ensure adequate forage for wildlife, display of wildflowers (scenic quality), and vegetation reproduction.

The fluctuation between scheduled movement dates will be based primarily upon the utilization levels (set a maximum of 50% of current year's growth) attained on perennial key species for the pasture. This will be done through permanent plot studies.

Response 18.14

See Response 18.18.

Response 18.15

Permanent range study plots will become an integral part of the proposed management, as outlined on page 1-29. These study plots will not be of an enclosure type and therefore will not require maintenance; they will be easy to read. This will assure continued monitoring of the proposed management for the area. Due to the nature of the vegetation (dense chaparral), we believe the type of plots outlined in BLM 4412.22c Manual are the best adapted for this area.

Response 18.16

The DEIS does not present actual use data because there have never been any actual use records for this area. For this reason, active use is the most reliable information available. Active use is defined as grazing privileges which have been paid for and are presently being used. The grazing case files in the El Centro Office contain bill collection records that show the AUMs paid for and used. The term "preference" means the maximum amount of livestock use which can be paid for and used. Thus, active use can be less than the preference but cannot exceed it. Preference can be considered the carrying capacity. Since BLM started charging by the AUM instead of by the acre, our allotment records show total payment for preference rights. It can then be said in this EIS that active use, or actual use, is the total preference. Therefore, the active-use column in the grazing tables in Chapter I should be used in place of actual use. In summary,for this DEIS, active use actual use equals preference rights.

There must be some mistake on your licensed use (active use) figures of 4,430 AUMs. Tables in Chapter I show licensed use (active use) to be 4,925 AUMs. This again is equal to the total preference for the DEIS area, as determined through our grazing record files.

A discussion of past grazing history from an unpublished manuscript entitled "Discussion of Fluctuations in Rangeland Use on the California Desert," by Paul Ernst (former biologist, BLM Desert Planning Staff, 1977) is included (see "Modifications and Corrections" section).

Response 18.17

Because of the small size of the allotment, rugged topography and unpredictable climate, more intensive and time-consuming grazing systems (such as those involving more herding) were felt to be non-viable and uneconomic alternatives. As a result, the systems outlined in Chapter I were designed and are believed to be more realistically implementable while still meeting the MFP's objectives.

Response 18.18

Minimum qualifications for a lessee are as follows: (1) he must be engaged in the livestock business, which is documented through tax receipts and receipts of livestock sales or purchases, and he must own or control land or water offered as base property. In addition, he must either be: (2) a citizen of the United States or have filed a declaration of intention to become a citizen or, (3) a group or association, or (4) a corporation authorized to conduct business in the state in which the grazing use is being sought.

If two or more applicants for use on the same public land meet all of the above requirements, 43 CFR 4110.5 provides criteria for allocation. The following criteria listed below are not in priority order and are applicable on a case-by-case basis:

Response 18.18 (cont.)

(1) Historical use of the public land;
(2) Proper range management and use, of water for livestock;
(3) General needs of the applicants' livestock operation(s);
(4) Public ingress and egress across privately owned or controlled lands leading to public lands;
(5) Topography; and
(6) Other land use requirements unique to the situation.

Response 18.19

As discussed in a conversation with Russ Shay (October 6, 1980) the titles of the two columns of Table III-12 have been changed from "suitability" and "non-suitability" to "suitable areas" and "non-suitable areas," respectively. Also, see the "Modifications and Corrections" section for other changes of this table.

Response 18.20

As you indicated, we do not have any historical information on the degree of impact on each threatened, endangered, or sensitive plant species resulting from livestock grazing. These impacts and mitigation to protect the plants will be identified by the environmental assessments (EAs) to be prepared for each allotment management plan. Information will be gathered by establishing experimental plots for each type of vegetative manipulation as well as for cattle grazing. For example, we may find that cattle occasionally sample but do not favor or graze particular species or that prescribed burning can actually enhance a species. This information will give us a basis for providing all AMPs with proper mitigation to protect and enhance sensitive plant species.

Response 18.21

The 3.45 tons per acre allowable soil loss was derived from various parts of the San Diego Soil Survey Manual, Parts 1 and 2 (SCS, 1973).

Response 18.22

See the "Modifications and Corrections" section, below, for additional information on the rationale for selecting suitable wilderness areas. See, also, in the same section, the wilderness suitability criteria matrix.



September 22, 1980

El Centro Resource Area Manager
Bureau of Land Management
833 South Waterman Ave
El Centro, CA 92245

Dear Sir,

The draft E.I.S. for the Eastern San Diego County Planning Unit has been reviewed and the No Action Alternative number five (5) is selected as the best form of management at this time. We believe the federal government has so far placed enough restrictions and controls on the public lands in California without adding any more. We also notice that livestock operations in other districts administered by the BLM have strenously objected to range land and grazing proposals such as outlined in your proposal. Although we have no direct interest in grazing except for its effect on wildlife, we would strongly support the views and position of the local livestock people in the area involved.

The emphasis on wilderness is highly overrated and the remoteness, lack of access and general unfamiliarity of the public with the areas involved makes it highly questionable as to just how these lands could be properly judged by the public. We do not believe there is any immediate danger of these lands being made unsuitable for wilderness in the foreseeable future, therefore we believe they should be retained in their present status. We consider it a waste of the taxpayers time and money to even consider further study of these areas as shown in some of the alternatives presented.

19.1 The Carrizo Gorge and Eastern McCain Valley are under a state wildlife cooperative management agreement with particular concern over the subspecies Peninsular Bighorn Sheep. Wilderness classification for the areas utilized by this species of sheep would prevent development of proper and sound management of the herd, and this includes helicopters and other necessary management equipment or developments in these areas. The sheep, in our opinion, are sick and representative of a dying species. This goes for all sheep south of the Santa Rosa Mountains which are all in the decline without any successful amount of lambing in recent years. Any consideration for wilderness in the Eastern San Diego County Planning Unit would be in direct conflict with sound management and manipulation of both the sheep and their habitat.

19.2

P. O. Box 669 • Sacramento, California 95803 • 916-444-6504

19.3

It was our understanding that our use of the manmade roads existing in the Eastern McCain Valley along the escarpment would be reviewed by the end of this year. The RAMP for this area did provide for such review, however, we find the report assumes motorized vehicular use of this area to be undesirable from every standpoint in the report and even proposed utilization of the existing roads as hiking and horsetrails, We find no impacts identified with the potential loss of vehicular access to the areas covered in the EIS therefore we consider the statement to be inadequate in that it does not reflect the recreational opportunities that would be foregone under the alternatives providing for wilderness. The BLM assumes that current levels of rockhounding, hunting, camping, sightseeing and other aesthetic opportunity would not be affected by restriction of motorized vehicles and this assumption is wrong, nor is there any measurable amount of impact shown in the report to this effect, We therefore consider the report to be truly inadequate on this respect.

Sincerely,

Ed Dunkley
Administrator

cc: The Honorable Clair W. Burgener
The Honorable Jerry Lewis

Response to California Association of 4WD Clubs Inc.

Response 19.1

Wilderness designation does not preclude the effective management of Peninsular bighorn sheep, especially when the presence of this species adds to the quality of the wilderness experience and to the value of the area in question. During the wilderness conflict resolution process (Table I-14), it was determined that mechanical means of reintroducinge bighorn sheep in the Canebrake/Inner Pasture area would be allowed. Also, if reintroduction precedes Congressional designation, exemptions may be unnecessary. The use of helicopters in wilderness areas is not prohibited. In addition, management activities and access for management purposes is permitted via horseback, foot, or, through exemption, by mechanical means.

Response 19.2

There are no scientific data to support the assertion that the Peninsular bighorn sheep in question are "sick and representative of a dying species." During an extensive study of the sheep, Russi and Monroe (1976) concluded that parasitic, bacterial, and viral disease were not the primary cause of mortality in the population. In addition, successful lambing was observed in 1979 in the population using the planning area by Cunningham (report in preparation) and it has also occurred for several years in other populations south of the Santa Rosa Mountains but outside of the planning area (unpublished data, Anza-Borrego Desert State Park files).

Response 19.3

See Response 16.4.

OFFICE OF THE DIRECTOR

United States Department of the Interior

BUREAU OF MINES
2401 E STREET, NW.
WASHINGTON, D.C. 20241

September 17, 1980

Memorandum

To: District Manager, Riverside District Office, Bureau of Land Management, Riverside, California

From: Director, Bureau of Mines

Subject: Draft environmental statement, Proposed Livestock Grazing and Wilderness Management for the Eastern San Diego County Planning Unit, California

Thank you for the opportunity to review this well-written draft. Our comments are confined to mineral resources.

The two brief paragraphs on page 2-14 concerning minerals do not convey the potential importance of local mineral resources. This potential of the proposed wilderness study areas will not be fully appreciated until mineral studies for these areas are undertaken.

A copy of these comments has been sent to the El Centro Resource Area Manager, El Centro, California.

Rue W. Harris
Acting Director

cc
EL Centro Resources Area Manager CA.

PARKS & RECREATION DEPARTMENT

RICHARD E. POLLOCK
DIRECTOR

COUNTY OF IMPERIAL

936 MAIN STREET
EL CENTRO, CALIFORNIA 92243

TELEPHONE 353-4266
AREA CODE 714

September 19, 1980

United States Department of the Interior
Bureau of Land Management
Riverside District Office
1695 Spruce Street
Riverside, California 92507

SUBJECT: Drafted Environmental Statement for the Eastern San Diego County Area (McCain Valley) California

Dear Mr. Hillier;

After a review of your draft, dated June 30, 1980, I can find no adverse effect to the public park and recreation activity in Imperial County which might reasonably be caused by this project.

Respectfully submitted,

Richard E. Pollock
Director, Parks and Recreation Department

El Centro, CA 92243

AN EQUAL OPPORTUNITY * AFFIRMATIVE ACTION EMPLOYER

UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE
630 Sansome Street
San Francisco, California 94111

1920

September 23, 1980

El Centro Area Manager
Bureau of Land Management
833 S. Waterman
El Centro, California 92243

SEP 29 1980

Dear Sir:

We have reviewed the subject DEIS for the Eastern San Diego County Planning Unit and have the following comments.

Overall the DEIS is a comprehensive and thorough treatment of the resources and area. Two areas of concern suggest themselves. The first is an implicit conflict between grazing and wilderness. Properly done, grazing is compatible and recent interpretations growing out of the C. Idaho Wilderness and California Wilderness Bills render these trade-offs indefensible, even though full grazing potential is not realized. The 1965 data used to establish forage production (P. 1-1) are probably too conservative, as this period was the peak of drought years in the area. Is it possible, given the current wet cycle, that estimates were over-corrected for total acres in the allotments?

22.1

22.2

The implied conflict between grazing and bighorn sheep lacks the kind of specific discussion on which reductions should be based. I would favor re-evaluation of the alternatives without reciprocal reductions in the grazing/wilderness allocations. If significant conflict between grazing/bighorn can be demonstrated in the text, then reductions in grazing would be more defensible to critics. Some field managers in both the Bureau of Land Management and U.S. Forest Service, as well as some of the ranchers involved, feel strongly that people and Off-Road Vehicles use have had a greater deleterious effect on the bighorn sheep than any other impact. While it is difficult to deal with this problem within the scope of the DEIS, I feel it is essential to do so in order to arrive at a balanced assessment of the alternatives. The visual resource management system the Bureau of Land Management is using is similiar to the one used by the Forest Service. The Forest Service has adopted the recommended visual quality objectives for the Laguna Mountain Recreation Area. It would be desirable to have the same VQO extend out over the Bureau of Land Management view sheds that are seen from the Cleveland Recreation Area.

22.3

22.4

22.5

These observations not withstanding, we would advocate an approach founded in the coordinated resource management planning mode. While single agency decisions often impinge upon the same operators and publics, at best the decisions tend to restrict the array of options available to any one land manager, public or private. The Eastern San Diego County Planning Unit presents a great opportunity to include Bureau of Land Management, Forest Service, counties, Indian tribes, ranchers, state agencies (Fish and Game), Soil Conservation Service, and many others. To be effective, decisions in this area will require wide support and interdisciplinary/interagency participation.

Your consideration of these comments will be appreciated.

Sincerely,

for John Chaffee
ZANE G. SMITH, JR.
Regional Forester

Response to U. S. Forest Service

Response 22.1

See Response 12.2.

Response 22.2

There is some misinterpretation concerning the establishment of forage production. The key words are "present authorized use." Present authorized use (referred to as "Preference" and "Range Class" in Grazing Systems Table) is in this case equal to the carrying capacity established in 1965. (See Response 18.21 for explanation). However, a new vegetation survey was conducted in 1978 and a new carrying capacity was established (p. 2-29) and the impacts of the proposed action revolved around the new carrying capacity. The carrying capacity established (p. 2-29) was based on perennial vegetation and did not include annuals. Annuals would be allocated on a year-by-year determination and on an allotment-by-allotment study.

Response 22.3

A new mitigation measure has been proposed to monitor bighorn populations in the In-ko-pah allotment. See "Modifications and Corrections" section, below.

Response 22.4

The BLM recognizes that factors other than grazing may have a deleterious effect on bighorn sheep; these include human intrusion, especially ORV activity. Therefore, as part of the planned actions outlined in the McCain Valley Wildlife Habitat Management Plan (U.S.D.I., BLM, 1978), visitor use has been limited in bighorn range by the closing of appropriate access roads (a more specific discussion of the stipulations is available in the McCain Valley HMP). To determine the impact of ORV activity in the area, the BLM is in the midst of a long-term study in which bighorn sheep use of habitat adjacent to ORV trails is being assessed both before and after road closures were implemented (Hicks, 1978; Cunningham, 1980; in preparation).

Response 22.5

The BLM Visual Resource Management (VRM) objectives for public lands adjacent to the Laguna Mountain Recreation Area are in the second-most protection-oriented land class (VRM Class II). Tentative visual quality objectives developed by the Cleveland National Forest indicate that Forest Service and BLM objectives for the region are compatible and that no abrupt changes in visual resource management policy are anticipated along agency boundaries. In this regard, the BLM used a number of viewing locations

along County Highway S-1 and facilities in the Mount Laguna area as key observation points during visual sensitivity analyses. Because many of the facilities overlooked public lands dealt with in the EIS, sensitivity levels were found to be high, which ultimately led to their VRM Class II rating. During future implementation actions, the BLM will coordinate closely with the Cleveland National Forest to insure continuity in agency visual resource management objectives.

CALIFORNIA NATURAL RESOURCES FEDERATION

State Affiliate of the National Wildlife Federation

PRESIDENT	NORTHERN CALIFORNIA VICE PRESIDENT	SOUTHERN CALIFORNIA VICE-PRESIDENT	SECRETARY TREASURER	2701 Cottage Way Suite 28
Jeffrey Jung	Thomas Smith	Dr. Michael McCoy DVM	Rudolph J.H. Schafer	Sacramento, CA 95825 Ph: (916) 483-1125

SEP 29 1980

U.S. Dept. of the Interior
Bureau of Land Management
El Centro Area Office
333 S. Waterman Ave.
El Centro, Calif. 92243

September 22, 1980

Gentlemen:

I have written the following comments on the Draft E.I.S. for proposed grazing and wilderness management in the East San Diego County area, for the following reasons:

(1) As a veterinarian, I have worked with staff in State and Federal agencies, and on my own, to encourage protection and better management of the resource bease upon which the Bighorn sheep depend.

(2) As the Southern California Vice-President of the California Natural Resources Federation, I will encourage the Board and membership to support this position.

Due to the pressures of work, these comments are a little late. However, this does not change their validity, and we insist that the glaring deficiencies in this Draft E.I.S. be rectified in the final product.

Sincerely,

Michael A. McCoy, DVM

MAM/ke

cc : Mr. Gerald Hillier

Mr. James B. Ruch

National Wildlife Federation

We use 100% recycled paper

Comments:

23.1 (a) Why does BLM consider it necessary to continue to permit grazing of cattle in San Diego County, since such cattle operations are no longer economically feasible? All cattle lease areas in the Eastern San Diego County Planning Unit (E.S.D.C.P.U.) are very small operations, when compared to others in California on public lands.

23.2 (b) On page 3-24 it is stated that the In-Ko-Pah and Mt. Tule allotments will be increased in the amount of cattle use under the proposed action. All other allotments will be decreased in the amount of cattle use under the proposed action. Since Bighorn sheep are found in the McCain Valley area only within the In-Ko-Pah and Mt. Tule allotments, it is irresponsible to consider increasing the number of cattle in or near the periphery of their habitat. The proposed mitigating measures will not control the problem of lease cattle moving through the wildlife fences. Straying cattle will contribute to the already present feral cattle problem in Carrizo Gorge and in areas near Grapevine Spring and upper Bow Willow Spring. Also, it is not realistic to expect to be able to eliminate feral cattle from these areas. The topography prohibits removal or elimination of cattle on a continual basis. The exclusion of 8,000 acres of Bighorn habitat from cattle grazing does not benefit Bighorn sheep, since these cattle do not respect artificial or physical barriers, and are capable of easily negotiating the steepest and most rugged terrain.

23.3 (c) The entire new allotment suggested under the proposed action (allotment B) will overlap Bighorn sheep habitat in the Mt. Tule area, not just the 800 acres as described on page C-4. The comments provided for the In-Ko-Pah and Mt. Tule allotments also apply to allotment B. In addition, when Bighorn come into contact with cattle during the winter-spring period, it will result in decreasing Bighorn utilization of the area during summer and fall. This has already occurred in Aravaipa Canyon in Arizona, where Bighorn and lease cattle compete for habitat on land administered by BLM (the Safford Resource Area.)

23.4 (d) The present BLM management of Bighorn habitat will actually result in the listing of the sheep as a rare animal, as defined in your own future Bureau policy, (BLM Manual 6840).

23.5 (e) On page 2-38 it is stated that "the population size and distribution of mule deer within the planning area is unknown." Management practices cannot be promulgated, therefore, since baseline data is unavailable, and estimates of deer density are without basis. We request a management plan for mule deer in the ESDCPU based on realistic information.

Thank-you for your attention.

Response to Natural Resources Federation

Response 23.1

By law, the BLM is directed to manage public lands under the principles of multiple use and sustained yield. Grazing is included as a legitimate use under this directive. Thus, the BLM must provide for the stabilization of the livestock industry while protecting the natural resources from destruction or unnecessary injury. There are several operators in the EIS area whose livelihood depends on ranching. The size of the operation is insignificant in terms of issuing a grazing lease. For example, if we eliminate an operator based on size, another lessee would be able to lease that area and all areas that would become available, resulting in large operations. Therefore, eliminating small operators would not elilminate grazing, only the user.

Response 23.2

Until 1972 the In-Ko-Pah Allotment had a grazing preference of 1,200 AUMs. At this time, the lessee took a temporary, voluntary reduction (down to 250 AUMs) because of the lack of water due to the drought, with the provision he could resume grazing at 1,200 AUMs when water sources were re-established. In the interim, the NRDC vs Morton suit provided, under court mandate, that all grazing leases would remain unchanged until the applicable grazing EIS is complete. Since 1972, bighorn sheep populations have fluctuated considerably (Table II-2) with no change in livestock use (250 AUMs). The increase the In-Ko-Pah Allotment would receive is still only one-third of the actual preference that existed prior to the voluntary reduction.

The increase in the Mt. Tule Allotment is associated with the mixed chaparral community. There are one or two sections of this allotment that are considered existing sheep habitat. These areas were determined unsuitable for livestock based on steepness of terrain and lack of water. Subsequently, the available forage in these sections was provided for wildlife.

It is our belief, after assessing all the input from the scoping meetings and public participation, that the proposed levels of livestock use, period-of-use, and fencing, together with new mitigation measures (see "Modifications and Corrections" section) would provide adequate protection of bighorn sheep habitat. Also see Response 6.2.

Response 23.3

See Response 8.2.

Response 23.4

The BLM is proposing to change present management which would benefit all resources. Bighorn sheep are already listed as rare by the State of California.

Response 23.5

During both in-house and public scoping sessions, mule deer were not identified as an issue. In addition, due to a limited availability of funds, it was determined during the preplan analysis that no big game studies would be carried out and that data gathering efforts would concentrate on species of primary concern, such as the State-listed (Rare) Peninsular bighorn sheep. Estimates of mule deer densities were therefore obtained through discussions with California Department of Fish and Game personnel and other investigators familiar with the area.

RICHARDS SPOTTS
6330 RAVENSIDE DR S
SACRAMENTO CA 95831



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DECEIVED

DICK MARI
EL CENTRO RESOURCE AREA MANAGER
BUREAU OF LAND MANAGEMENT
833 SOUTH WATERMAN AVE
EL CENTRO CA 92243

OCT 10 1980

DEAR MR MARI,

THIS MAILGRAM CONTAINS DEFENDERS OF WILDLIFE'S COMMENTS ON THE EASTERN SAN DIEGO COUNTY PLANNING UNIT DRAFT ENVIRONMENTAL IMPACT STATEMENT. WHILE WE APOLOGIZE FOR FAILING TO MEET THE COMMENT DEADLINE, WE ALSO HOPE THAT OUR CONCERNS CAN BE ADDRESSED IN THE FEIS CONSISTENT WITH THE INTERIOR DEPARTMENT POLICY OF CONSIDERING INPUT BEYOND A COMMENT PERIOD WHEN IT IS STILL FEASIBLE TO DO SO.

THE BASIC PURPOSE OF THIS MAILGRAM IS TO CONFIRM AND REITERATE THE CONTENT OF A TELEPHONE CONVERSATION I HAD THIS PAST MONDAY, OCTOBER 6, WITH WILLIAM HAIGH. IN THAT CONVERSATION, I TOLD MR HAIGH THAT I HAD RECEIVED A COPY OF RUSSELL SHAY'S DEIS COMMENTS DATED SEPTEMBER 22, AND WE STRONGLY SUPPORT AND SHARE THE SIERRA CLUB'S CONCERNS AND CRITICISMS. WE THEREFORE WISH TO INCORPORATE MR SHAY'S LETTER BY REFERNCE, AND REQUEST A RESPONSE TO THE MANY POINTS HE RAISES.

IN ADDITION, WE SHARE THE SIERRA CLUB'S ENDORSEMENT FOR GRAZING ALTERNATIVE 4-LIMITED USE. WE BELIEVE THIS ALTERNATIVE STRIKES A REASONABLE BALANCE IN FORAGE ALLOCATIONS, ESPECIALLY IN LIGHT OF THE IMPORTANT NEED TO MAINTAIN AND, WHEREVER POSSIBLE, INCREASE BIGHORN POPULATIONS.

DEFENDERS OF WILDLIFE ALSO SUPPORTS WILDERNESS ALTERNATIVE 1-MAXIMIZE WILDERNESS. THIS ALTERNATIVE RECOGNIZES THE FRAGILE NATURAL VALUES INVOLVED, OFFERS THE BEST PROTECTION FOR BIGHORN, AND PROVIDES OTHER BENEFITS. IN THIS CONTEXT, WE WOULD SUPPORT SPECIAL LANGUAGE ALLOWING MECHANIZED ACCESS INTO THESE WILDERNESS AREAS FOR THE PURPOSE OF AIDING BIGHORN REINTRODUCTION OR DEVELOPING BIGHORN WATER SOURCES.

SIMILARLY, WE SUPPORT PRESCRIBED BURNING IN WILDERNESS SO LONG AS IT IS USED TO RESTORE OR DUPLICATE HISTORIC FIRE CYCLES. FIRE IS A NATURAL AND ESSENTIAL ASPECT OF ECOLOGY, AND WE CONCUR WITH MR SHAY THAT YOUR DEIS UNFAIRLY PORTRAYS PRESCRIBED BURNING AS ANTITHETICAL TO WILDERNESS STATUS.

PLEASE SEND US A COPY OF THE FEIS. THANK YOU VERY MUCH FOR CONSIDERING OUR VIEWS.

Mailgram

RICHARD SPOTTS
CALIFORNIA FIELD REPRESENTATIVE
DEFENDERS OF WILDLFE 6330 HAVENSIDE DRIVE #5 SACRAMENTO CALIFORNIA
95831

21:45 EST

MGMCOMP MGM

Part II

Modifications and Corrections

Part II

MODIFICATIONS AND CORRECTIONS

Executive Summary, page xiv is revised to read:

"Wilderness Alternatives

"Alternative 1 - Maximize wilderness

"The designation of a WSA as a wilderness area will establish protection of wilderness resources as that area's dominant objective. This will generally result in reduced soil erosion, increased game and hunting success, and a greater opportunity for solitude and primitive recreation. Sensitive plants and wildlife, cultural resources, and Native American values will receive added protection. Approximately 23 miles of roads and ways will be closed to off-road vehicle users. On 54,024 acres of land, options for developed recreation sites, land development, and pre- and post fire suppression activities will be limited to protecting human life, private property and an area's wilderness quality. Vegetative manipulations will be restricted to actions that maintain and/or improve wilderness qualities. On January 1, 1984, or the date of designation, whichever is later, the wilderness areas will be closed to mineral entry. Thereafter, only patented and patent pending claims can continue operations. Thirteen springs will not be maintained with the aid of vehicle use."

Chapter I, pages 1-11/1-16, revision of Description of Alternative:

"Description of the Alternative

"This alternative, the proposed action (MFP Step 2 recommendations), strives to balance the needs and requirements of livestock and competing resources. It is proposed to develop five new AMPs, modify two existing AMPs, continue the management of one allotment under an existing AMP, and terminate use on two allotments. The San Felipe Allotment will be expanded from 1,285 acres to 1,845 acres. Vallecito Allotment will be enlarged by 400 acres from 15,213 acres to 15,613 acres. The Canebrake Allotment will be decreased from 8,836 acres to 7,611 acres to aid in the reintroduction of bighorn sheep. To provide protection of existing bighorn habitat, the In-Ko-Pah Allotment will be reduced from 16,283 acres to 7,903 acres. Map I-4 indicates the allotment boundaries. Table I-5 gives the allotments and forage allocations under this alternative. Table I-6 shows range developments and vegetative treatments which are proposed. Table I-7 shows the proposed schedule of implementation."

Chapter I, page 1-26, "Priority of Implementation," change "three years" to "five years" each place it appears.

Chapter I, in response to comments 18.7 and 18.22, add the Suitability Matrix (below) after page 1-31.

Figure 1-1
Suitability Criteria Matrix
Wilderness Study Areas

Suitability Criteria

Impacts/ Rehabilitation

	San Ysidro	San Felipe	Sawtooth	Carrizo Gorge	Table Mountain
Demand	Low for primitive recreation. No unique views or characteristics.	Low for primitive recreation. Poor visual qualities & no unique features.	Low for primitive recreation at pres, but will probably be used moderately in the future.	Moderate for hiking. Prime bighorn sheep habitat for management.	Low for primitive recreation. Moderate for ORVs. No unique visual resources or features.
Public Opinion	Low expression in favor of wilderness.	Moderate expression in favor of wilderness.	Strongly in favor for reintroduction of Bighorn Sheep. Strong expression in favor of wilderness designation	Strong desire to protect bighorn sheep herd. No known substitute for visual resources.	Moderate expression in favor of wilderness. Strong expression in favor of use by miners & ORVs.
Substitutes	High number of substitutes of equal or higher value exist for primitive recreation, solitude, and naturalness.	Hi number of substitutes of equal or higher value exist for primitive recreation, solitude, & naturalness.	No known substitute for diversity & transition between ecological communities	No substitutes for bighorn sheep herd. No known substitute for visual resources.	Hi number of substitutes of equal or higher values for primitive recreation, solitude.
Conflicting Resources	Trespass, new grazing allotment, land disposal, ORVs, visual resources.	Fire suppression vs. man's impacts are unnoticeable. Trespass, ORVs, visual res, land disposal.	Bighorn sheep reintroduction, sand & gravel development, geothermal development, ORVs	New grazing allotment vehicular access to wildlife waters, mineral development, ORVs	ORVs, mineral development, geothermal development.
Rehabilitation	No substantial need for rehabilitation.	Poor probability of the impacts of man ever becoming substantially unnoticeable.	Moderate probability of the impacts of man ever becoming substantially unnoticeable.	High probability of the impacts of man becoming subtantially unnoticeable.	No substantial need for rehabilitation.
Future Options	Grazing - low. Low potential to provide recreation opportunities. Disposal.	Reintroduction of Bighorn sheep. Material sites could not be developed.	Reintroduction of Bighorn sheep. Material sites could not be developed.	Manage as an ACEC to protect bighorn sheep	Commercial jojoba collecting.
Supply	Resources are abundantly found in surrounding area.	Resources are abundantly found in surrounding area.	Low no. of areas where peninsular bighorn sheep can be released. Area is good to fair for release purposes. Unique transition between ecolo. comm.	Only source of unique vistas & viewsheds. Peninsular bighorn sheep is a California listed species.	High number of substitutes of equal or higher values for primitive recreation.
Condition and Trend	Fair & stable for naturalness. Poor for opportunities for primitive recreation and solitude.	Poor for opportunities for prim rec & solitude. Vegetation is improving unnoticeably of man's impacts.	Excellent & stable for naturalness, opportunities for primitive recreation & solitude.	Excellent & stable for naturalness, opportunities for primitive recreation & solitude.	Opportunities for primitive recreation and solitude are declining.
Uniqueness	No unique qualities were identified within the area by the public or the Bureau.	No unique qualities were identified w/in the area by the public or the Bureau.	Contains Calif. listed peninsular bighorn sheep habitat. Trans, between & intermix of desert shrub & chaparral ecological communities.	Existing herd of peninsular bighorn sheep. Spectacular overlooks of Carrizo Corridor.	No unique qualities were identified within the area by the public or the Bureau.
Diversity	Moderate diversity of ecological communities or visual resources.	Moderate diversity of ecological communities or visual resources.	Topography, vegetative communities, & visual resources are very diverse.	Very diverse in fauna and topographic relief.	Low diversity of topography, visual resources or ecological communities.
Sensitivity	No negative impacts to sensitive resources.	No negative impacts to sensitive resources.	Primitive recreation increases. Fire mgt reintroduction of bighorn sheep grazing. Water source development.	Primitive recreation increases. Development of 3 overlooks. Fire mgt Water source development.	No negative impacts to sensitive resources.
Law, Regulation, Policy	Wilderness Act, FLPMA Min Law of 1872, Rare & End Spec Act, Antiquities Act, Sanitation codes, CA Pub Res Code (Fire)	Wilderness Act, FLPMA Min Law of 1872, Rare & End Spec Act, Antiquities Act, CA Pub Res Code (Fire)	Wilderness Act, FLPMA, Immigration laws, Policy to delist state listed plants & animals Antiquities A., R&S Spec A., Min. Law 1872	Wilderness Act, FLPMA Immigration laws, Policy to delist state listed plants & animals Antiquities A. Min Law 1872	Wilderness Act, FLPMA Mining Law of 1872, Immigration Laws, Antiquities Act.
Manageability	Poor ability to protect res, to provide rapid search & rescue serv, sanitary fac, lim legal access, remote & isolated parcel of public land.	Poor ability to protect resources, to provide rapid search & res serv. Lim leg. access, remote & isolated parcel of public land.	Area is protected by natural barriers. Lge size & diversity permits disposal of users. Lim access pts complements state pk & prop state wilderness.	Area is protected by natural barriers. Lge size & diversity permits disposal of users. Limited access pts Compliments state pk & proposed state wilderness.	No legal access. Poor ability to control ORVs.
Economics	Cost of mgt for wilderness would exceed projected benefits to be derived.	Cost of mgt for wilderness would exceed projected benefits to be derived.	Cost would not exceed benefits.	Cost would not exceed benefits.	Cost of management of wilderness would exceed projected benefits to be derived.
Land Ownership	Adjacent to proposed Sheep Cyn State Wilderness. Size & shape makes area impossible for protecting wilderness resources.	Adjacent to Anza-Borrego Desert St. Pk. Size & shape provide poor probability of man's impact being unnoticeable.	Adjacent to proposed Sombrero Peak State Wilderness. Size & shape have high probability for wilderness management.	Adjacent to proposed Sombrero Peak & Carrizo Cyn State Wild. Size & shape have hi probability for wild. management.	Adjacent to proposed Jacumba Mtn State Wilderness. Size & shape provides poor probability for wilderness management.

Chapter I, page 1-32, in response to comments 18.1 and 18.2, add the following five paragraphs to the end of the Suitability Criteria Section:

Following the public review of the final EIS, the California Desert District Manager will review the FEIS and associated public comments prior to making his final MFP Step 3 decisions. These will include his final wilderness recommendations. However, the wilderness recommendations do not represent a final decision of the Secretary of the Interior. Further requirements specified by Congress remain to be satisfied with respect to wilderness, involving both the areas shown in this plan as "suitable" for wilderness designation and the areas shown as "nonsuitable." Therefore, all the wilderness recommendations in this EIS are preliminary, and are subject to change during further administrative review.

Only Congress can designate an area as wilderness. Both FLPMA and the Wilderness Act establish a process by which the Bureau of Land Management sends its recommendations to the Secretary of the Interior, who sends his recommendations to the President, who then sends his recommendations to Congress for final action. In the case of Eastern San Diego County, the following requirements remain to be satisfied before the Secretary can send his recommendations to the President: (1) Public hearings required by the Wilderness Act must be held on the proposed recommendations; and (2) Mineral surveys required by FLPMA "prior to any recommendations for the designation of an area as wilderness," will "be conducted by the Geological Survey and the Bureau of Mines to determine the mineral values, if any, that may be present in such areas." (The latter requirement applies only to areas recommended as "suitable" for wilderness designation.)

A report(s) will be prepared for each wilderness study area. The report(s) will include a summary of recommendations, the EIS, the results of the USGS/BM/BLM mineral surveys, transcripts of public hearings, and comments received. The report, as required by the Wilderness Act of 1964, will be transmitted first to the Secretary of the Interior and then to the President. These requirements will be met as soon as possible after publication of this final EIS, and must in any case be met by no later than October 21, 1991. Within two years of the receipt of the report from the Secretary, the President must advise Congress of his recommendations with respect to designation as wilderness of each WSA, together with a map of the area and a definition of its boundaries. Until Congress decides whether or not each WSA will be managed as a wilderness area, each WSA will be managed in accordance with the Bureau's Interim Management Policy and Guidelines for Lands Under Wilderness Review (December 12, 1979).

Bureau policy has not been developed as to when Fire Management Plans (FMP) and Wilderness Management Plans (WMP) will be prepared. The current projection is that they will either be completed for each WSA recommended as suitable and incorporated in the suitability report or only for Congressionally designated wilderness areas. The FMPs will consider management objectives for each area, historic fire occurrence, natural role of fire, proposed degree of suppression, expected fire behavior, acceptable pre-

suppression and suppression techniques, adequate buffer zones, smoke management, and effects on adjacent landowners. Criteria defining the limits of acceptable fire weather, fire behavior, and fire effects will be developed (910 DM 1.3 (E)). Each WMP will discuss goals, objectives, current situation and assumptions, and management mechanisms to be used. Protection of the wilderness resources (e.g., opportunity for solitude, flora and fauna), land-use, and protection will be addressed.

Whenever possible, FMPs will be incorporated into the WMP. If scheduling permits, the FMP may not appear as a separate document from the WMP.

Chapter I, page 1-34, in response to comments 8.5 and 16.1, add to areas to be acquired in the Sawtooth Mountains:

(4) Section 36, T. 14 S., R. 5 E., SBM, in the Sawtooth Mountains.

Chapter I, page 1-37, in response to comments 8.5, 8.6, 8.7, 16.1, 16.2, and 16.3, insert between paragraphs 2 and 3:

The Canebrake and Inner Pasture roads will be closed to the general public. The roads will continue to be used by the grazing lessee and visitors to private property in Section 36, T. 14 S., R. 3 E., SBM.

Delete paragraph 3:

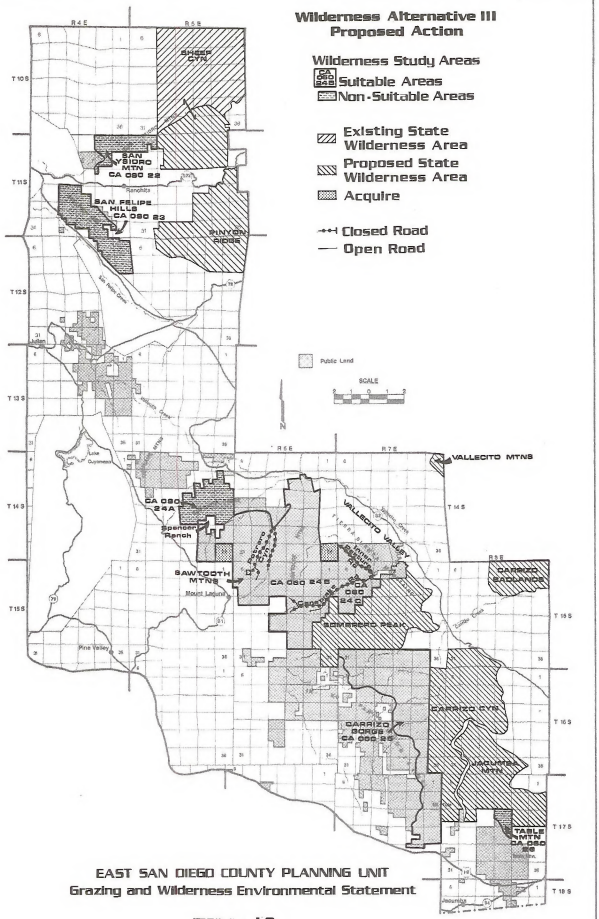
~~Sections 19, 20, and 21 (T. 14 S., R. 6 E., SBM), are also recommended non-suitable for designation. Wilderness management would be enhanced by placing the wilderness boundary along survey lines with proposed grazing fences as visible boundary lines. Sightings of other visitor users would be reduced, thereby enhancing solitude experiences. Because of relatively flat topography, non-suitability designation would reduce enforcement and conflicts between wilderness users and off-road vehicle users.~~

Paragraph 4 is revised to read:

~~A third area recommended as non-suitable for wilderness designation is Potrero Canyon, where two existing roads are separated, at most, by three-quarters of a mile. It would be impossible to manage for or provide a wilderness experience in this narrow strip. South of Township 14, where the roads diverge,~~ The roads would be closed allowing ~~part of~~ the Potrero Valley floor to be included as wilderness.

Paragraph 5 is revised to read:

The proposed alternative recommends the remainder of the Sawtooth Mountains (27,205 acres) as suitable for wilderness designation (Map I-8). Acquisition of a 40-acre parcel in Potrero Canyon and the privately owned Section 36, and section 36, T. 14 S., R. 5 E., SBM, in Inner Pasture is proposed. The road in Inner Pasture would be closed except to provide access to valid existing rights.


Wilderness Alternative III
Proposed Action
Wilderness Study Areas
CA 050 24A
Suitable Areas
Non-Suitable Areas
Existing State Wilderness Area
Proposed State Wilderness Area
Acquire
Closed Road
Open Road
Public Land
SCALE
N
R4E
R5E
R6E
R7E
R8E
T10S
T11S
T12S
T13S
T14S
T15S
T16S
T17S
T18S
SHEEP CYN
SAN YSIDRO MTN CA 050 22
SAN FELIPE HILLS CA 050 23
CANYON RIDGE
Sycamore
San Ysidro Creek
Indian
Tecate Creek
Tecate Creek Canyon
Luse
Guyamaca
CA 050 24A
Spencer Ranch
SAWTOOTH MTNS
Mount Laguna
Pine Valley
Pine Valley Creek
Descanso
CA 050 24B
CA 050 24
Cedar Creek
Cedar Creek Falls
Sweetwater River
SWEETWATER REAR
Sweetwater Reservoir
Loveland Reservoir
Jamul
Jamul Mtns
VALLECITO MTNS
VALLECITO VALLEY
Vallecito Creek
Vallecito Stage Station
CARRIZO BADLANDS
CARRIZO CYN
CARRIZO GORGE CA 050 25
MOUNTAIN MTN
TABLE MTN CA 050 26
Table Mtn
Jacumba
EAST SAN DIEGO COUNTY PLANNING UNIT
Grazing and Wilderness Environmental Statement
map no. I-8

In response to comment 18.22, insert the following between paragraphs 6 and 7:

The Sawtooth Mountains have been recommended as suitable for a number of reasons. The views from the Sawtooth Mountains are spectacular. The area's size, shape, and terrain combine to create an outstanding opportunity for primitive, unconfined recreation and for solitude. This would be the first part of the National Wilderness Preservation System where one can go from the Colorado Desert to the Peninsular Mountain Range and remain in, and at the same time be traveling through, an area where there are few signs of man. Wilderness area designation would complement the ecosystem management of Anza-Borrego Desert State Park, since the Sawtooth Mountains contains a unique transition of plants between the desert shrub and the chaparral communities. Scientists wish to preserve the transition for future in-depth research. Wilderness designation would also be supportive of the reintroduction of Peninsular bighorn sheep.

In response to comment 18.22, insert the following between paragraphs 7 and 8:

Several factors led to the recommendation of the Carrizo Gorge WSA as suitable. The area provides spectacular views of the Carrizo Corridor where De Anza's and Butterfield's Overland Stage Routes passed. As a wilderness area, these views would be protected as well as the viewsheds seen from Cleveland National Forest and Anza-Borrego Desert State Park. The resident herd of Peninsular bighorn sheep provides the uncommon opportunities for viewing by visitors. This California-listed subspecies would be protected from commercial pressures. Isolated stands of fan palms (Washingtonia filfera) grow in the study area. Extremely rugged opportunities exist for primitive recreation. Wilderness designation would complement the management of most resources within the study area and would augment the management of Anza-Borrego Desert State Park.

Chapter I, page 1-38, paragraph 1 is revised in response to comments 16.4 and 18.5 to read:

All of Table Mountain (958 acres) is recommended as non-suitable because the area is unmanageable as wilderness. Presently, the BLM does not have legal access to the WSA. The visual resources are not outstanding in relation to adjacent lands in the State of California's proposed Jacumba Mountains Wilderness Area. Even with legal access, the small size of the area would make it difficult to manage for a quality wilderness experience. Experience at Joshua Tree National Monument (Colville and Anderson, pers. comm., 1979) has shown that ~~physical barriers are required to keep off-road vehicles from using established wilderness areas.~~ posting signs is ineffective in preventing ORV use. Physical barriers are required to keep off-road vehicles from using established wilderness areas. ~~But the~~ Barriers have been successful only when used to block narrow access points that are frequently patrolled. This WSA would require over 1 1/2 miles of continuous barriers of ~~doubtful~~ questionable effectiveness. The ineffectiveness of signs and need for frequent, aggresive patrolling has also been ~~the~~ experienced at nearby Anza-Borrego Desert State Park.

Chapter I, page 1-40, in response to comment 18.22, insert between paragraphs 2 and 3:

All of the Carrizo Gorge WSA is recommended as suitable for wilderness designation. The rationale for the recommendation would be as described for Alternative 3.

Chapter I, page 1-40, add the following new section between paragraph 3 and Implications of Wilderness Designation:

Disposal of San Ysidro Mountain and San Felipe Hills

Step 1 of the Management Framework Plan (MFP) required that all public lands within the Eastern San Diego County Planning Unit be examined to determine if ownership should be retained by the Bureau of Land Management. The Federal Land Policy and Management Act (FLPMA) and the Code of Federal Regulations provide (as a result of land-use planning), the criteria for disposing of land. In part, they requrie "that disposal of a tract of public land must be "...because of its location or other characteristics is difficult and uneconomic to manage as part of the public lands..." (FLPMA, PL 94-579, Sec. 203(a)(1)). The lands within the San Ysidro Mountain and San Felipe Hills WSAs meet these requirements and were recommended for disposal in MFP Step 2 with the following provisions.

(1) The California Department of Parks and Recreation would be given preference to acquire either or both tracts in total. This can be accomplished through the State's right of in-lieu selection tracts.

(2) Lowest priority would be to sell the tracts to one or a few individuals.

(3) A tract must be disposed of in total; no sale will occur for only a portion thereof.

Disposal must be preceded by the following actions. Congress must designate Wilderness Study Area(s) CA-060-022 and/or CA-060-023 as nonsuitable for wilderness. A land report and and environmental assessment must be prepared on each tract. In addition, because San Felipe Hills exceeds 2,500 acres, the designation to dispose must be submitted by the Secretary of the Interior to Congress and meet the requirements of Section 203(c) of FLPMA. Both FLPMA and 43 CFR 2700 specify the procedures for actual disposal by sale.

Chapter I, page 1-40, paragraph 4 is revised to read:

Alternative 4 recommends the remainder of the Sawtooth Mountains as suitable for wilderness designation (Map 1-9). Acquisitions would be identical to those in the proposed action. The Sawtooths would still have many of the same outstanding qualities for wilderness as described in Alternative 3,

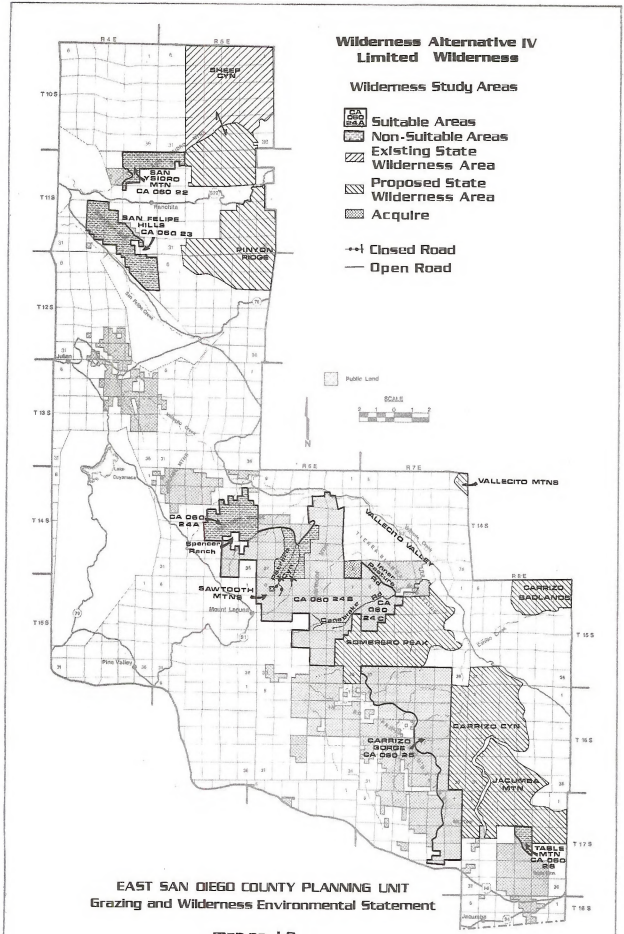
but Potrero Canyon would be nonsuitable for wilderness. This was done in order to provide hunters, rockhounders, and off-road vehicles with improved vehicular access into the area. Furthermore, commercial apiarists could continue their use of the Sawtooths. Improved access would be traded for an increase in the primitive recreation user's awareness of man's presence.

Chapter I, page 1-41, paragraph 1 is revised to read:

Livestock grazing existing prior to wilderness designation is permitted to continue under the Wilderness Act. By law, grazing, like mining, is compatible with wilderness. Congress has further specified that certain uses, such as the use of motorized equipment for grazing operations, are permissible within wilderness areas (House of Representatives Report #96-617). In the enabling legislation of some wilderness areas, Congress has specifically permitted activities normally precluded by wilderness designation. However, FLPMA and the Wilderness Act together prohibit the establishment of new grazing uses. Grazing use within the proposed grazing allotments boundary (see Grazing Alternatives 2 ~~and 3~~) must be established prior to wilderness designation to qualify as an existing use. Otherwise, the allotments could not be established without an Act of Congress. However, the Bureau recognizes this does not preclude the development of AMPs on grazing leases that existed and were being grazed prior FLPMA.

Paragraph 6 is revised in response to comment 18.2 to read:

Wildfires and insect epidemics can be attacked with any tool available. The tools and methods will be selected to cause a minimum of degradation. Pre- and post-suppression methods are not exempted, but they must result in a direct benefit to wilderness. Treatments that degradate an area's naturalness and do not promote public safety are not permitted (for example, fuelbreaks, reseeding with exotic species. ~~prescribed burns to reduce fuel buildup, etc.~~). A fire management plan (FMP) will be prepared in conjunction with implementation of wilderness designation and will identify what pre- and post-suppression methods can be used for fire control. The FMP may alleviate the impacts of wilderness designation through judicious actions (for example, fuelbreaks, prescribed burns, etc.) outside a wilderness area.



EAST SAN DIEGO COUNTY PLANNING UNIT
Grazing and Wilderness Environmental Statement

map no. I-9

Chapter I, pages 1-48 and 1-49, Table I-13 is revised to read:

Land Disposal	Acres	54,024 Designated land can only be transferred to another Federal agency for management as part of the NWPS.	54,024 Subject to general land laws. Specifically, San Ysidro Mtn. and San Felipe Hills are recommended for disposal.	41,776 Same as for Alternative 1. Non-suitable areas are subject to the general land laws. Specifically, San Ysidro Mtn. and San Felipe Hills are recommended for disposal.	39,383 Same as for Alternative 1. Non-suitable areas are subject to the general land laws. Specifically, San Ysidro Mtn. and San Felipe Hills are recommended for disposal.
Boundary Adjustments		Only additions to existing wilderness areas are permitted. Exceptions are Congressional mandates through legislation.	Subject to general land laws.	Same as for Alternative 1. Non-suitable areas are subject to the general land laws.	Same as for Alternative 1. Non-suitable areas are subject to the general land laws.
Rights of Ways for new Roads and Distribution Lines		Restricted to valid existing rights (e.g., inholdings) and mining developments. Subject to stringent environmental and feasibility evaluations. (Currently one mining claim in San Ysidro Mtns. and three inholdings in Sawtooth Mtns. Inholdings are proposed for acquisition.	Subject to general land laws.	Same as for Alternative 1. Non-suitable areas are subject to the general land laws. (Currently two inholdings in Sawtooth Mtn. Inholdings are proposed for acquisition.	Same as for Alternative 1. (Currently two inholdings in Sawtooth Mtn. One inholding in Inner Pasture is proposed for acquisition.

Chapter I, page 1-56, Table I-14, Item Number 3 under "Conflict Resolution" is revised to read:

3. Designate as "limited area" for ORVs. Restrict vehicles to roads in ~~Potrero and~~ Storm Canyon. ~~Close roads in Potrero at boundary between T. 14 S., and T. 15 S.~~ Close Potrero Roads.

Chapter I, page 1-64, Table I-14, Item Number 3 under "Conflict Resolution" and "Resource Trade-Off" is revised to read:

Conflict Resolution	Resource Trade-Off
3. ~~Cherry stem~~ Close both roads in Potrero. ~~up to boundary between T. 14 S. and T. 15 S. beyond that, roads would be closed.~~ Cherry stem Storm Canyon Road.	3. Not everyone may be able to hike the last four ~~.5 - .75~~ miles of roads to be closed, thus precluding their partaking in recreation opportunities at end of existing roads.

Chapter II, page 2-21, the discussion of "Range Condition" is revised in response to comments 17.2, 17.3, and 18.11 to read:

Range Condition

Commonly defined, "range condition" relates current conditions of the range to the potential (ecological condition/climax) of which a particular area is capable. The EIS deviates from this by using livestock forage condition for classification into condition classes. Livestock forage condition is based on two factors: 1) Percent composition of desirable, intermediate and least desirable plants, and 2) Soil Surface Factor (SSF). This procedure is outlined in BLM Washington Office Memorandum 75-52, February 6, 1975. Standards used were based on vegetation composition from 1975 vegetation transects (BLM 4412 Manual) and soil surface factors determined at the same time. Based on comparisons of this data with vegetative surveys conducted in 1978, it was determined that range conditions existing in 1975 are generally descriptive of range conditions in 1978.

Vegetation was classified as follows:

1) Desirable plants: Are palatable, productive, and nutritious forage species, are often dominant under climax or near climax conditions, are long-lived, and have extensive root systems to aid in protecting the watershed against erosion. This category includes the important key species which are to be maintained or increased by intensive livestock management.

2) Intermediate plants: Are of secondary importance in the climax and are usually associated with, or indicative of, ecological successional stages. They replace the desirable plants as condition deteriorates and replace the least desirable plants as condition improves. They may be less palatable to grazing animals or be more resistant to grazing use.

3) Least desirable plants: Include those that are definately the poorer species in an ecosystem and consist principally of annuals, invaders, noxious, and low value forage plants. All annuals and poisonous species are included in the classification.

Standards for classification into each condition class (mentioned in BLM Washington Office Instruction Memorandum 75-52 change 1, March 10, 1975) were as follows:

1) Good Condition: Composition is 40% or more of both desirable and intermediate species with at least 20% made up of desirable species. SSF is less than 40.

2) Fair Condition: Composition is 15-39% of desirable and intermediate species with 5 or more percent made up of desirable species. SSF if less than 60. Also, those ecosystems where the composition comprises 60% or more of the intermediate species and less than 5% desirable species are present will be rated "fair condition" when the SSF is less than 60.

3) Poor Condition: Composition is less than 15% desirable and intermediate species. SSF is more than 60. It should be noted that if the SSF of an ecosystem is more than 60, the site is rated in "poor" condition regardless of the plant composition.

4) Unclassified: Includes steep rocklands over 50% slope.

Step-toe transects (BLM 4412 Manual) were used to collect data from the major vegetative communities. SSF were determined at the same time. The SSF is an expression of current erosion activity. Seven catagories of surface features are considered by the fieldman in the examination of the area represented by each transect. Both wind and water erosion are considered as applicable to each catagory. These features are: soil movement, surface litter, surface rock, pedestalling, rills, flow patterns, and gullies. (BLM Manual 7322.11B8a).

Table II-6 describes the livestock forage condition classes by allotment. Map II-6 shows the present livestock forage condition of the study area.

Page 2-32, LAND USE, new section to be inserted before "Livestock Grazing Section (Ernst, 1977)."

Historical Background information on Livestock Grazing

Documented livestock use of the Anza-Borrego area begins about 1875 when individuals began moving into the McCain Valley and surrounding areas. The canyons of the mountainous area have been used more frequently than the lower plains which are used primarily when there has been sufficient rainfall to trigger a lush crop of annual plants. Although cattle have been the dominant herbivores within the Anza-Borrego Desert, sheep have also utilized the forage. There were about two to three thousand resident sheep from the border to (the other) Rattlesnake Canyon. However, additional sheep were brought from the coast to graze in above average rainfall years. Mr. J. L. McCain felt there would have been four to six thousand cattle in the area west of the Salton Sea from the border to Whitewater Canyon. The largest cattle company in the area would, most likely, have been the Campo Cattle Company, which was at its peak at about the turn of the century. It was felt by one rancher in particular that considerable damage was done to the range during the late 1800's and again about the middle and late 1940's.

There have been several factors which have affected the forage resource in this area (A-B). One, as previously mentioned, was that of overgrazing which has reduced many perennial grass populations to mere skeletons of their original numbers. A second factor which cannot be as readily identified is that of disasterous floods and a subsequent general decline in annual precipitation that followed. There is still vivid evidence of the scars wrought upon the land by those floods. According to several individuals in this area, many of the once productive meadows were reduced to unproductive washes. The general decline in precipitation in this area also had a profound impact. According to several old timers, most of the now dry canyons had perennial streams running in them at the time of settlement. A current dry cycle is believed to have begun about 1950. An indicator that this might have occured also before settlement is reflected in a story told by Mr. McCain, who is well over 80 years old. He said his father told him that he asked an old Indian why there weren't any fish in the many running streams. The Indian who could speak only a little English is claimed to have said "Bye and bye, no water here." This would indicate that perhaps this area was in an above average rainfall cycle at the time of settlement.

Trying to determine just exactly what has occurred to reduce the carrying capacity of this area might be partially explained by Mr. McCain himself. "When I asked my old dad...how in the hell did you fellas ever run so damn many cattle in this country? And he said, 'Well, I'll tell you, when we came here the whole damn country was wading in bunch grass. And it was like that all across the desert, even in the mountains.' Well, you've seen it where the cattle haven't eaten it all."

There were several years of extraordinarly severe weather conditions which affected livestock production. 1882 was remembered as having an extremely heavy snowfall, while seven years prior to 1905 were recollected as being very dry. 1905 was remembered a year of heavy rainfall as was 1916, 1926, and 1937. 1948 was a year of extremely heavy rainfall, with its effects still visible on the lower canyons and desert.

Chapter II, page 2-37, revised Table II-12

Table II-12

Season		Plant Type Grasses	Forbs	Browse	Sedge	Fern	Cacti
Summer (May-Sept)	Bighorn	2.06	22.93	66.08	--	.31	7.49
	Cattle	25.58	17.1	52.54	--	--	.93
Fall Oct-Nov)	Bighorn	1.65	48.54	33.03	--	.1	16.67
	Cattle	8.83	26.03	61.88	.05	--	3.08
Winter (Dec-Feb)	Bighorn	1.59	33.46	58.08	--	.61	6.25
	Cattle	4.79	13.04	69.37	.64	--	11.95
Spring (Mar-Apr)	Bighorn	5.96	34.39	54.66	--	.38	2.76
	Cattle	12.51	19.13	67.98	.05	--	.21
Overall Average	Bighorn	2.52	31.74	56.66	--	.36	7.92
	Cattle	15.41	17.89	60.82	.17	--	3.92

Chapter II, page 2-38, Existing Conflicts, first paragraph is revised to read:

Existing Conflicts

The In-Ko-Pah, Mt. Tule, and Tierra Blanca grazing allotments encompass essential bighorn sheep habitat. Cattle occupy bighorn range in upper Carrizo Gorge near Tule Canyon, the Grapevine Spring area of Rockhouse Canyon, and the Sombrero Peak area. Hicks (1978), reported that cattle sign was observed in many areas of 50% slope or greater; these areas are not included in grazing allotments and therefore represent areas of conflict between cattle and bighorn sheep. Light, in 1969, reported that cattle were observed in the upper watershed of Rockhouse Canyon (enriched desert scrub habitat) in the In-Ko-Pah Allotment and around Grapevine Spring during the summer and had been utilizing the area since early spring. Since that time, bighorn use of the area has decreased. Recently, bighorn have been observed only occasionally in the vicinity of Grapevine Spring (Russi, pers. comm., 1980). An estimated four to six head of cattle were using the Carrizo Gorge area within the intensively used bighorn sheep habitat at Four Frogs Spring and Cimaron Spring during June, 1979 (Russi, pers. comm., 1980). Cattle have increased their use of a critical bighorn summer water source near Sombrero Peak (Semi-desert chaparral habitat) in the Tierra Blanaca Allotment. This source previously received regular spring and summer use by bighorn, but they have not observed using it since 1977 (Russi, pers. comm., 1980). Annual intensive summer surveys of this bighorn habitat by Anza-Borrego State Park personnel from 1972 to 1975 did not record within this area (Turner and Jorgensen, 1975). However, cattle and cattle sign have been observed in the area from 1976 to the present (Russi, pers. comm., 1980).

The spread of livestock into bighorn sheep range, and the concomitant exit of bighorn sheep, has also been documented in other areas (Camel, pers. comm., 1980; Irvine, 1969; Wilson, pers. com., 1980). Furlow (pers. comm., 1980) also has stated that bighorn sheep distribution is strongly affected by presence or absence of cattle. Weaver (pers. comm., 1980) also believes that significant conflicts exist between grazing and bighorn sheep.

Chapter II, page 2-55, paragraph 1, is revised in response to comments 6.1, 8.4, and 18.4 to read:

Management options for the study area are extremely limited. Generally, the area is only a mile wide, but the steepness of the south facing slope will naturally concentrate visitors to a quarter mile ribbon running along the ridgeline. Only a limited number of small parties could use the area and still maintain an opportunity for solitude. Management for a solitude experience will preclude the use of the area as an access route to Hellhole Flats and Sheep Canyon Roadless Area. If use increases, there would be difficulties in protecting the wilderness resources from the impacts of users in such a restricted area. Extensive trampling followed by soil erosion would result. Intensive physical control measures would need to be

applied to prevent or reduce site deterioration. While these measures may control deterioration, they would compromise the naturalness of the area. It is unlikely that sanitary facilities will be provided that meet U.S. Public Health Service and San Diego Health and Planning codes. Camping is hazardous because of periodic strong winds and lightning storms. Providing enforcement, monitoring, maintenance, and rescue services on a regular basis is impossible. ~~Travel time from El Centro, the closest BLM Office, is 2.5 hours each way. Little time will remain to hike into the study area and perform any management functions.~~

Problems also exist with management of the San Ysidro Mountains as a non-wilderness area. The area has an extensive history of trespass. The proposed Hellhole Flats trail would increase visitation and the need to provide search and rescue services. A backcountry management program would be needed.

Chapter II, page 2-55, last paragraph is revised to read:

The location of San Felipe Hills makes them unmanageable as public lands. Legal access is not readily available to the Bureau. Trespass has not been successfully controlled in the area. The Bureau has not been albe to rapidly provide search and rescue services. Grazing lease administration costs exceed grazing fees. The parcel is isolated and remote from other public lands. The Bureau can neither effectively monitor nor protect the resources of the area. The management problems caused by the location of San Felipe Hills are unique to the Bureau. First preference in disposal (see Chapter I) would be given to the California Department of Parks and Recreation. Due to proximity of existing facilities, the Anza-Borrego Desert State Park would not encounter the same management problems the Bureau has experienced if the lands were to be administered by the Park.

Chapter III, page 3-21, first sentence is revised to read:

Treatments will have little or no short-term impacts on the existing 800 acre seeding in the Oriflamme allotment since the area is already denuded of 70% to 80% of the vegetation.

Chapter II, page 3-40, mitigation measure 13 is revised to read:

13. Pursuant to the Rangeland Memorandum of Agreement between BLM and the Advisory Council on Historic Places, a comprehensive survey of cultural resources will be conducted on each burning area prior to project implementation. The level of detail of these surveys is presently being negotiated with the State Historic Preservation Officer. Depending upon the results, certain areas may be avoided and sites may be mitigated as outlined in numbers 1-3. Based on the nature of the resource base in the specific area to be burned, season of burning will, if necessary, be adjusted to lessen heat and impacts to sites.

Chapter III, page 3-45, new mitigation measure.

Within the In-Ko-Pah Allotment, permanent pellet transect lines will be established around critical watering holes after eliminating livestock to determine any increase in sheep use. This will be beneficial in determining the degree of inflicted stress on bighorn in this region from the presence ~~alone~~ of livestock. If studies show positive evidence that this is a significant problem, then steps will be taken to have the remaining five square miles of habitat eliminated from livestock grazing. The implementation of such a decision would be subject to present BLM policy. This means the rancher would have up to three years, after the decision to reduce the allotment, to attain the level of use determined by the authorized officer.

Chapter III, page 3-48, last paragraph is revised in response to comment 18.2 to read:

Therefore, recommending a WSA or portion thereof, as suitable should be interpreted to mean that BLM feels the wilderness values can be best protected, utilized, and managed as a wilderness area. The ~~"Discrete Actions-~~"Implications of Wilderness Designation" portion of Chapter I points to the fact that an agency's discretion in managing a parcel of land will be somewhat limited under wilderness designation. Generally, ~~presuppression (e.g., fuelbreaks and prescribed burning) and post suppression fire control techniques,~~ vegetative manipulations, introduction of exotic plants and animals and certain recreational activities (e.g., trail bike riding) and services (e.g., flush toilets) are precluded. Pre suppression and post suppression fire control techniques may be utilized if recommended in a fire management plan (FMP). The recommendation will be made utilizing Congressional directives to consider public safety and the protection of an area's wilderness qualities.

Chapter III, page 3-54, last paragraph is revised in response to comment 18.2 to read:

A San Felipe Hills wilderness (5,265 acres) designation will negatively impact ORV use by closing three miles of existing trails. No impacts are anticipated for rockhounding, sightseeing, and hunting. A positive impact will be provided by maintaining the quality of hiking and equestrian use. ~~The area has had a history of wildfires. The recent accumulation of fuels combined with a prohibition against prescribed burning could have severe adverse impacts upon neighboring ranches due to the increased hazard for fire in the area.~~

Chapter III, page 3-55, paragraph 6 is revised in response to comment 18.2 to read:

Part of the Sawtooth's are within the boundary of the Laguna-Moreno Demonstration Area (joint cooperative project involving various State and Federal Agencies) for the prevention of catastrophic fires. The use of prescribed burns will be allowed only if such actions are shown to have an overall positive impact and contribute to the improvement of the area's wilderness resources. ~~If prescribed burning is not allowed, this will result in a negative impact to the Demonstration Area's planned techniques.~~

Chapter III, page 3-56, paragraph 1 is revised in response to comment 18.2 to read:

The Sawtooth Wilderness Area contains sensitive plants such as Opuntia bigelovii var. hoffmanii and Cassia covessii. Wilderness designation will reduce the potential for adverse impacts on these plants. ~~However, the area has considerable dense chaparral ecotypes and the unnaturally dese chaparral growth resulting from years of fire suppression is eliminating plants that require a more open environment. The general prohibition against prescribed burns will adversely affect the intolerant plants.~~

Paragraph 6 is revised in response to comment 18.2 to read:

Prescribed burns will occur only when they positively improve public safety or wilderness resources. ~~Fuels will continue to accumulate in chaparral ecotypes and the potential for catastrophic fires is increased. The absence of prescribed burns will adversely impact plants that cannot compete with the increasing density of the chaparral community.~~ As was the case in the Sawtooth Mountains Wilderness Area, sensitive plants will benefit from protection afforded by wilderness management.

Chapter III, page 3-57, paragraph six is revised to read:

The major impact of a nonsuitability determination on the San Ysidro Mountain (2,131 acres) would be that the WSA will not become a part of the National Wilderness Preservation System (NWPS). In this case, the MFP recommends disposal of the entire block to one or more parties. First preference would be given to the Anza-Borrego Desert State Park acquiring the area through the use of in lieu selection. The area's location would provide access to portions of Anza-Borrego Desert State Park and would be consolidated with existing parts of the park. ~~The California Department of Parks and Recreation is not expected to encounter the management problems that this isolated parcel of public land has provided to the Bureau.~~

Otherwise, the BLM will continue administration. Under present management recommendations, the Hellhole Flat hiking trail will be constructed to provide access to a remote section of Anza-Borrego Desert State Park. Recreational emphasis will be placed upon hiking, backpacking, horseback riding, rockhounding, hunting, and sightseeing. This will result in an adverse action due to infringing overuse and sanitation problems upon some aspects of wilderness values. The "cures" for these problems (e.g., providing sanitary facilities) will in themselves result in impacts on the areas naturalness.

Chapter III, page 3-59, last two paragraphs are revised to read:

Proposed developments include new water developments for the area. These developments benefit bighorn sheep and are also beneficial to grazing operations. ~~One new grazing allotment is proposed in the southern portion of the unit.~~

~~New allotment B would be established under the BLM Interim Management Policy and Guidelines for Land Under Wilderness Review and will be an existing use at the time of designation. The impact of new water developments and new grazing areas are not anticipated to be adverse to wilderness values.~~

Chapter III, page 3-60, last paragraph is revised to read:

Approximately ~~85%~~ 87% of the Sawtooth Unit (~~25,515~~ 27,205 acres) are recommended as suitable for Wilderness Area designation. This will result in the same impacts as described in alternative 1, except that ~~five~~ one miles of existing roads will remain open for use by ORVs. ~~and to allow the temporary placement of beehives on the wilderness area's perimeter.~~

Chapter III, page 3-61, paragraph one, line two, add between "Canyon" and "will": ...and section 36, T. 14 S., R. 5 E., SBM...

Chapter III, page 3-61, paragraph six is revised to read:

Grazing will continue as part of the Tierra Blanca, In-Ko-Pah, Mt. Tule allotments. But grazing will be eliminated from the desert shrub vegetation zone within these allotments which are utilized by bighorn. In addition, the majority of the three existing allotments include a very limited amount of acreage within the Carrizo WSA boundary. This acreage occurs as an overlap along the eastern boundary of the allotments. ~~New grazing allotment B (2,937 acres) will be allowed which is located at the southern end of the wilderness area. The new allotment will be established under the Interim Management Policy Guidelines for Wilderness Management existing use at the time of designation.~~

Chapter III, page 3-63, Table III-13, Alternative 1, number 4 is revised to read:

4. ~~Removal of vehicles and~~ Utilization of ~~existing roads,~~ abandoned ways and trails will permit vegetative growth. Mitigation measures utilized for the Pacific Crest Trail will insure visual impacts are held to a minimum.

Chapter III, page 3-64, Unavoidable Adverse Impacts, Alternative 1, is revised in response to comment 18.2 to read:

Mining activities will be visible and will reduce the quality level of wilderness areas. Grazing operations will also reduce the quality of the visitor's wilderness experience. The wilderness areas will be closed to off-road vehicle use and will have the maximum indirect impact of forcing prospectors, hunters, and rockhounders to walk and additional six miles. Until FMPs are prepared, fuel accumulations will be unnatural because fire suppression will continue. ~~and the prohibition against prescribed burns for fire managment will prevent the natural periodic burning of the area. As a result,~~ The chaparral will become thicker and deer browse will decline. Intolerant plants associated with early successional stages will be eliminated as the chaparral community expands. The fire danger within the wilderness area will remain high because of the accumulation of fuels. ~~Due to anticipated fuel buildups, the severity of fires within the wilderness areas will be greater than if prescribed burns were conducted and the risk of fires spreading from the wilderness areas is increased.~~ These very hot burns will have adverse impacts upon cultural resources and their interpretation. Developed recreational facilities (i.e., three scenic overlooks of the Carrizo Gorge) will not be developed within wilderness areas. Vegetative manipulations for the benefit of cattle and wildlife is also prohibited. But these impacts will be mitigated through the implementation of fire management plans. The plans will judiciously use a variety of techniques to protect both public's safety and the area's natural resources.

Appendix A, page A-16, in response to comment 18.13, addition of Section 4.

APPENDIX A

Section 4

BLM Manual 4412 - Physical Resource Studies

.24 Mediterranean Annual Study Method.

A. Purpose. Purpose of these procedures is to analyze the productive condition and species composition in relation to mulch residue in the Mediterranean annual type. This will help determine amounts of mulch needed for sustained production and evaluation for adjustments needed in stocking rates. Procedures apply only to Mediterranean ranges in the state of California. (See 4112.7.)

1. Collection of data for evaluation of the annual type requires six steps: photographs, estimates of composition, observed apparent trend, mulch residue determination, climate, and actual use. Establish plots in the same manner described for range trend study plots. See 4112.22C2. However, these Mediterranean annual plots will not be used for trend studies as is done on other ranges.

a. Photographs will be taken in accordance with part 4412.22C4 of this manual, using either the 3' X 3' or 5' X 5' plot. Include both closeup and general view photos.

b. Composition estimates are recorded on Form 4412-23 (Illustration No. 29) for the species considered most important to management objectives for the specific allotment. The species selected may have bad as well as good qualities, but must be valuable as indicators. Even though the selected species are not present each year, estimates in subsequent years will include only the original species chosen. Composition is estimated in the spring when plants are easily identifiable. An estimate is made of the composition on the photographic plot and also on the mulch plot(s) clipped the previous fall. See 4412.24A1d(3)(a). Consult Form 4412-22 (Illustration No. 28) for location of plots clipped previous fall.

c. Observed apparent trend is recorded on Form 4412-23 with a short narrative statement on soil stability which describes present erosion conditions and the indication of any active erosion. Evidence of grazing is described by livestock use patterns that are present and any past patterns that might be recognized or known. A short narrative statement is made by the examiner from his overall observation of the apparent trend at time of examination.

d. Mulch Residue Determination for Mediterranean Annual Ranges

(1) Equipment.

(a) Plot frame, either round or square, to define 9.6 square foot plot.

(b) Spring scale calibrated in grams.

(c) Paper sacks.

(d) Clipping shears.

(2) Number of plots. A minimum of 2 plots per key area.

(3) Plot location. Select locations within key areas that represent an average of animal use for the stratum. See 4412.21C2, criteria for stratification. Use photographic plots to orient and relocate mulch plots.

(a) Clipping vegetation and removing mulch destroys the effects of mulch accumulation. Move mulch plots each year after sampling for composition in the spring.

Plots will be moved each year starting in the NW quarter from photographic plot and then moving in a clockwise direction to the NE, SE, SW and back to the NW. Mulch plots will be set a minimum of 10 feet from photographic plots. If a circular plot is used, a steel stake marker should be placed in center of plot. If square plot, then angle iron stakes at opposite corners. These plots will not be clipped again but will be used the next spring for composition estimates. Remove stakes in spring (and re-set for mulch plots to be clipped in the fall). Care should be taken not to re-use an old plot after each cycle.

(b) Clip or remove all standing vegetation to ground level. Remove all undecomposed plant material that was produced on the plot, using caution not to include any soil or other foreign material. The sample is air dried.

(c) Record the air dry weight in grams for each clipped plot on Form 4412-22. Total weight (b) is that for all of the plot weights in grams. Average weight (c) is the average of all plots in the same pasture multiplied by ten to indicate average mulch in pounds per acre. Column (d) indicates composition plot direction and distance from the photographic plot.

(4) Training required is minimal. The key area and plot location must be made by the resource manager, but the clipping and weighing can be performed by students or sub-professionals.

(5) Production. If current production is desired, a caged plot could be added for each two mulch plots used as in the paired plot method. Refer to 4412.22B7a of this manual.

e. Climate anaylsis will be made in accordance with 4413.21D.

f. Actual use records will be kept in accordance with 4412.22A.

Chapter II, page 2-55, paragraph 6, delete the second sentence.

Errata

Executive Summary, page xii, paragraph two, line four. Delete "distant from BLM office and"

Page xiv, paragraph four. Change the number of acres recommended as suitable under alternative three to 41,776 and unsuitable acres to 12,248 here and elsewhere in the EIS. Change the miles of ORV use eliminated under alternative three from 14 to 20 here and elsewhere in the text.

Chapter I, page 1-11, last paragraph. Change second sentence to "It is proposed to develop five new AMPs."

Chapter I, page 1-12, map 1-4. Map should not show new allotment B.

Chapter I, page 1-13, table 1-5. Eliminate new allotment B and all associated values.

Page 1-41, fourth paragraph. Change Wilderness Activity Management Plan (WAMP) to Wilderness Management Plan (WMP) here and elsewhere in text.

Page 1-45, table I-13. Change increased walking distance under alternative III from two to six miles here and elsewhere in text.

Page 1-46, table I-13, Suppression. Change "WSAs" to "wilderness areas."

Page 1-64, table I-14, number 4. Change "class" to "VRM class."

Chapter I, page 1-65, number 6. Change "Spencer Ranch Road" to "Spencer Ranch."

Chapter I, page 1-65, number 1. Change 25,515 acres to 27,205 acres.

Chapter III, page 3-49, first line. Delete "these prohibitive."

Chapter III, page 3-50 to 53, table III-12. Change column headings from suitability and non-suitability to suitable and areas and non-suitable areas respectively.

Delete from page 3-51, suitable areas column, "and new allotment B" and "for example, prescribed burns in the San Felipe and Canebrake allotments will not occur unless they will enhance wilderness values" and "and B."

Delete from page 3-52, suitable areas column, "Only new allotment B will be introduced prior to designation."

Chapter III, page 3-61, paragraph 2. Change 5,582 acres to 3,892 acres.

Chapter III, page 3-62, paragraph 2, line six. Delete "allowing."

Chapter III, page 3-64, last paragraph. Change 25,515 acres to 27,205 acres. Change 5,582 acres to 3,892 acres.

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